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*Attorneys for Defendant*  
*Fenix International Limited dba OnlyFans*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and PATHAMAWAN  
HANFORD, an individual,

Plaintiffs,

vs.

BRITTANYA RAZAVI; MARCELLO RAZAVI;  
MEOW GANG PRODUCTION STUDIOS, INC.,  
DG MEDIA & ENTERTAINMENT GROUP,  
INC., FENIX INTERNATIONAL LIMITED dba  
ONLYFANS; and DOES 1-10 inclusive,

Defendants.

DG MEDIA & ENTERTAINMENT GROUP,  
INC.; MEOW GANG PRODUCTION STUDIOS,  
INC.; MARCELLO RAZAVI; and BRITTANYA  
RAZAVI,

Counterclaimants,

v.

LAUREN COLVIN, YOUREE GEMMILL, and  
PATHAMAWAN HANFORD,

Counter - Defendants.

Case No.:

**APPENDIX OF EXHIBITS  
REGARDING NOTICE OF  
REMOVAL OF CIVIL ACTION –  
VOLUME 1**

Defendant Fenix International Limited dba OnlyFans (“Fenix”), submits its Appendix of

Exhibits to its Notice of Removal of Civil Action.

Exhibit No.	Exhibit Description	Volume	Bates No.
A	Complaint filed 6/9/2021	1	001-014
B	Plaintiffs' Ex Parte Motion For Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice filed 6/10/2021	1	015-023
C	Order for Issuance of Prejudgment Writ of Attachment filed 7/8/21	1	024-028
D	(Filed Under Seal) Defendants' Notice of Document to Be Filed Under Seal filed 7/19/21	1	029
E	Notice of Appearance filed 7/20/2021	1	030-031
F	Initial Appearance Fee Disclosure filed 7/20/21	1	032-033
G	Defendants' Motion to Vacate Order or, Alternatively, Discharge Prejudgment Writ of Attachment on Order Shortening Time (Razavi) filed 7/20/21	1	034-080
H	Defendants Motion to File Under Seal Exhibit C on Order Shortening Time filed 7/20/21	1	081-097
I	Stipulation and Order to Vacate Court's July 8,2021 Order granting Plaintiff's Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice filed 7/27/21	1	098-105
J	Notice of Entry of Stipulation and Order filed 7/27/21	1	106-115
K	Substitution of Attorney for Plaintiffs filed 8/12/21	1	116-119
L	Motion to Associate Counsel (Michael D. Kuznetsky and Michael W. Fattorosi) filed 9/16/21	1	120-153
M	Notice of Hearing filed 9/17/21	1	154
N	Defendants' Opposition to Motion to Associate Counsel filed 9/24/21	1	155-169

O	Reply Brief in Support of Motion to Associate Counsel filed 9/30/21	1	170-173
P	Minute Order filed 10/25/21	1	174
Q	Order Granting Motion to Associate Counsel (Michael Kuznetsky) filed 10/25/21	1	175-179
R	Order Granting Motion to Associate Counsel (Michael Fattorosi) filed 10/25/21	1	179-182
S	Notice of Entry of Order Granting Motion to Associate Counsel (Michael Kuznetsky) filed 10/27/21	1	183-190
T	Notice of Entry of Order Granting Motion to Associate Counsel (Michael Fattorosi) filed 10/27/21	1	191-198
U	Summons – Brittanya Razavi filed 11/10/21	1	199-201
V	Summons - Marcello L. Razavi filed 11/10/21	1	202-204
W	Summons - Meow Gang Productions Studios, Inc. filed 11/10/21	1	205-207
X	Summons – DG Media & Entertainment filed 11/10/21	1	208-210
Y	Notice Of Change Of Address Of Counsel filed 12/14/21	1	211-213
Z	Notice Of Change Of Address Of Counsel filed 12/14/21	1	214-216
AA	Affidavit of Due Diligence - Brittanya Razavi filed 2/10/22	1	217-224
BB	Affidavit of Due Diligence - Marcello Razavi filed 2/10/22	1	225-234
CC	Affidavit of Due Diligence - DG Media & Entertainment filed 2/10/22	1	235-246
DD	Affidavit of Due Diligence - Meow Gang Production Studio filed 2/10/22	2	247-256
EE	Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant Brittanya Razavi and Request for Permission to Serve by Publication filed 2/11/22	2	257-276

FF	Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant Marcello Razavi and Request for Permission to Serve by Publication filed 2/11/22	2	277-298
GG	Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant Meow Gang Production Studios, Inc. and Request for Permission to Serve by Publication filed 2/11/22	2	299-322
HH	Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant DG Media & Entertainment Group, Inc. and Request for Permission to Serve by Publication filed 2/11/22	2	323-348
II	Order Granting Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant DG Media & Entertainment Group, Inc. and Request for Permission to Serve by Publication filed 2/14/22	2	349-352
JJ	Order Granting Plaintiff's Ex Parte Application for Enlargement of Time to Serve Defendant Brittany Razavi and Request for Permission to Serve by Publication filed 2/14/22	2	353-356
KK	Order Granting Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant Marcello Razavi and Request for Permission to Serve by Publication filed 2/14/22	2	357-360
LL	Order Granting Plaintiffs' Ex Parte Application for Enlargement of Time to Serve Defendant DG Media & Entertainment Group, Inc. and Request for Permission to Serve by Publication filed 2/14/22	2	361-364
MM	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Enlargement of Time to Serve Defendant Brittany Razavi and Request for Permission to Serve by Publication filed 2/22/22	2	365-371
NN	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Enlargement of Time to Serve Defendant Marcello Razavi and Request for Permission to Serve by Publication filed 2/22/22	2	372-378
OO	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Enlargement of Time to Serve Defendant Meow Gang Production Studios Inc and Request for Permission to Serve by Publication filed 2/22/22	2	379-385

PP	Notice of Entry of Order Granting Plaintiff's Ex Parte Application for Enlargement of Time to Serve Defendant DG Media & Entertainment Group, Inc. and Request for Permission to Serve by Publication filed 2/22/22	2	386-392
QQ	Affidavit of Publication filed 3/24/22	2	393
RR	Affidavit of Publication filed 3/24/22	2	394
SS	Affidavit of Publication filed 3/24/22	2	395
TT	Affidavit of Publication filed 3/24/22	2	396
UU	Defendants' Answer to Plaintiffs' Complaint and Counterclaim filed 5/31/22	2	397-410
VV	Defendants' Initial Appearance Fee filed 5/31/22	2	411-413
WW	First Amended Counterclaim filed 6/8/22	2	414-425
XX	First Amended Complaint filed 6/21/22	2	426-446
YY	Plaintiffs and Counter-Defendants' Answer to First Amended Counterclaim filed 6/29/22	2	447-451
ZZ	Defendants' Answer to Plaintiffs' First Amended Complaint filed 7/5/22	2	452-456
AAA	Joint Case Conference Report filed 7/29/22	2	457-466
BBB	Mandatory Rule 16 Pre-Trial Scheduling Conference Order	2	467-473

Dated this 26<sup>th</sup> day of August, 2022.

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*Attorneys for Defendant  
Fenix International Limited dba OnlyFans*

### CERTIFICATE OF SERVICE

I certify that I am an employee of McDonald Carano LLP, and that on the 26th day of August, 2022, I caused a true and correct copy of the foregoing **APPENDIX OF EXHIBITS REGARDING NOTICE OF REMOVAL OF CIVIL ACTION – VOLUME 1** to be electronically filed with the Clerk of the Court by using CM/ECF service and serving on all parties of record via U.S. Mail as follows:

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Gang Production Studios Inc. and DG Media &  
Entertainment Group Inc.*

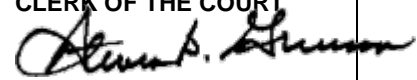
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*Attorney for Plaintiffs and Counter-Defendants  
Lauren Colvin, Youree Gemmill and  
Pathamawan Hanford*

/s/ Beau Nelson  
An employee of McDonald Carano LLP

# **EXHIBIT A**

Electronically Filed  
6/9/2021 4:52 PM  
Steven D. Grierson  
CLERK OF THE COURT


**COMP**

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CASE NO: A-21-836019-C  
Department 19

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**DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Case No.:

Dept. No.:

Plaintiffs,

v.

**COMPLAINT**

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.; and  
DOES 1-10 inclusive;

ARBITRATION EXEMPT  
Amount in Controversy Exceeds \$15,000  
and Equitable Relief Requested

JURY TRIAL REQUESTED

Defendants.

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///



1 COMES NOW, Plaintiffs, LAUREN COLVIN, YOREE GEMMILL, and  
2 PATHAMAWAN HANFORD, by and through their undersigned counsel, and as and for their  
3 Complaint against Defendants, BRITTANYA RAZAVI; MARCELLO RAZAVI; DG MEDIA &  
4 ENTERTAINMENT GROUP, INC.; MEOW GANG PRODUCTION STUDIOS, INC.; DOES 1-  
5 10 inclusive; allege as follows:  
6

7 **PARTIES**

8 1. That at all times mentioned herein, Plaintiff, LAUREN COLVIN (hereinafter  
9 “Colvin”) is an individual domiciled in Los Angeles, California. That the acts complained of  
10 herein all occurred in Las Vegas, Nevada.

11 2. That at all times mentioned herein, Plaintiff, YOREE GEMMILL (hereinafter  
12 “Gemmill”) is an individual domiciled in San Diego, California. That the acts complained of  
13 herein all occurred in Las Vegas, Nevada.

14 3. That at all times mentioned herein, Plaintiff, PATHAMAWAN HANFORD  
15 (hereinafter “Hanford”) is an individual domiciled in Las Vegas, Nevada. That the acts  
16 complained of herein all occurred in Las Vegas, Nevada.

17 4. That upon information and belief, Defendant, BRITTANYA RAZAVI (hereinafter  
18 “Brittanya”) is and was at all times relevant herein an individual domiciled in Las Vegas, Nevada.

19 5. That upon information and belief, Defendant, MARCELLO RAZAVI (hereinafter  
20 “Marcello”) is and was at all times relevant herein an individual domiciled in Las Vegas, Nevada.

21 6. That upon information and belief, Defendant, DG MEDIA & ENTERTAINMENT  
22 GROUP, INC. (hereinafter “DG Media”) is a Nevada corporation with its principal place of  
23 business in Las Vegas, Nevada.

24 ///

25 ///

7. That upon information and belief, Defendant, MEOW GANG PRODUCTION STUDIOS, INC. (hereinafter “Meow Gang”) is a Nevada corporation with its principal place of business in Las Vegas, Nevada.

8. That the true names and capacities of the defendants sued herein as Does 1 through 10 are unknown to Plaintiffs, who therefore sues said Defendants by such fictitious names. Plaintiffs are informed and believe and thereon allege that each of the fictitiously named defendants is responsible in some manner for the harm sustained by Plaintiffs as described herein. Plaintiffs will seek leave to amend this complaint to state the true names and capacities of such defendants when they become known to Plaintiffs.

## **JURISDICTION AND VENUE**

9. That jurisdiction and venue are proper in this Court because the acts and omissions complained of herein occurred and caused harm primarily within the City of Las Vegas and Clark County, Nevada. Furthermore, this actions seeks damages in excess of \$15,000.00.

## **FACTUAL ALLEGATIONS AS TO ALL CAUSES OF ACTION**

10. That this action arises from Defendants' wrongful conduct wherein, upon information and belief, Defendants intentionally misrepresented that they would take a 50% commission from Plaintiffs' earnings in exchange for management services. Once given access to Plaintiffs' bank accounts, Defendants, and each of them, surreptitiously placed all of Plaintiffs' earnings directly into Defendants' own bank accounts.

11. That Defendant Brittany Razavi, also known as Brittanya O’Campo, is a reality television and social media personality. Brittanya appeared as herself on three reality television shows within the years 2009 and 2010, entitled *Rock of Love with Bret Michaels*, *Charm School with Ricki Lake*, and *I Love Money*. After these appearances, Brittanya gained popularity on social media, including Instagram, from posting lewd pictures of herself.

1           12. That upon information and belief, Defendant Marcello Razavi, also known as  
2 “Lucky Razavi,” is currently married to Brittanya and has a background in the fashion industry.

3           13. That upon information and belief, in or about February 2020, Brittanya began  
4 posting pornographic content of herself on an Internet website located at Onlyfans.com.

5           14. That OnlyFans is a content subscription website on the Internet where content  
6 creators can earn money from users who subscribe to their content—the “fans.” It allows content  
7 creators to receive funding directly from their fans on a monthly basis as well as one-time tips and  
8 using a pay-per-view feature. In addition to other types of content, pornography is allowed and  
9 the website is used mainly by pornographic models, both amateur and professionals, as well as  
10 sex workers to sell photographs and videos directly to their fans.

11           15. That in or about July 2020, Brittanya posted a message on her Instagram account  
12 stating that she was “Looking for girls to manage.” In particular, upon information and belief,  
13 Brittanya sought to attract naïve, vulnerable young women who Brittanya could manipulate into  
14 creating pornographic content that Brittanya could sell on OnlyFans while defrauding the women  
15 of their earnings.

16           16. That in or about July 2020, each Plaintiff saw the Instagram post and contacted  
17 Brittanya to obtain further information. At the time, Plaintiff Colvin resided in Dallas, Texas;  
18 Plaintiff Gemmill resided in San Diego, California; and Plaintiff Hanford resided in Las Vegas,  
19 Nevada.

20           17. That after initiating conversations over Instagram, Brittanya moved the  
21 conversation with each Plaintiff to text messages and telephone calls, and set up individual,  
22 personal, face-to-face meetings with each Plaintiff here in Las Vegas.

23 ///

24 ///

1           18. That Brittanya purchased a plane ticket for Colvin to fly out to Las Vegas, Nevada  
2 for the meeting. Gemmill and Hanford traveled to their respective meetings in Las Vegas,  
3 Nevada by car.

4           19. At each of these initial meetings with Plaintiffs, Brittanya offered to manage  
5 Plaintiffs for the purposes of producing and exploiting pornographic content on OnlyFans.  
6 Brittanya represented and agreed that if the Plaintiffs worked with her, it would be an at-will  
7 management relationship that was terminable at any time. Brittanya offered to take fifty percent  
8 (50%) of Plaintiffs' earnings from OnlyFans as a commission for her services. Each Plaintiff  
9 naively agreed to the terms. None of the Plaintiffs had prior experience in the pornographic  
10 content industry.  
11

12           20. That thereafter, Brittanya promptly pressured each Plaintiff into signing a one-  
13 page document in front of a witness and/or notary. Brittanya refused to give the Plaintiffs a copy  
14 of the document they signed.  
15

16           21. That Brittanya set up each Plaintiff's OnlyFans page. In doing so, Brittanya solely  
17 entered her own bank account information as source for income to be distributed from OnlyFans.  
18 That upon information and belief, such bank accounts belonged to Brittanya, Marcello, Meow  
19 Gang, and/or DG Media. Brittanya did not advise Plaintiffs of this nor did Plaintiffs consent to it.  
20 However, Brittanya refused to give Plaintiffs the passwords to their own accounts. As a result,  
21 Plaintiffs were unable to view what content was posted, how much money was being earned, and  
22 how much money Brittanya was fraudulently taking from them.  
23

24           22. That likewise, Brittanya set up and controlled Instagram accounts for the Plaintiffs  
25 for the purposes of marketing their OnlyFans pages. The Plaintiffs were not given the passwords  
26 to access these accounts.  
27

28 ///

1           23. That upon information and belief, Marcello, through his alter ego DG Media,  
2 would assist in Brittanya's scheme by, *inter alia*, editing the photos and videos of the Plaintiffs.  
3 Brittanya would then post such content on Plaintiffs' respective OnlyFans and Instagram pages.

4           24. That Brittanya never showed or told Plaintiffs the amount of income earned on  
5 their OnlyFans pages and reneged on her agreement to take a management percentage. Instead,  
6 Brittanya had all of the money transferred to Defendants bank accounts and gave the Plaintiffs a  
7 meager weekly stipend.  
8

9           25. That during the time Colvin worked with Brittanya, Colvin's OnlyFans account  
10 earned gross income of approximately \$1,170,544.49, from which a net amount was paid out by  
11 OnlyFans totaling approximately \$946,890.20. Upon information and belief, Defendants  
12 wrongfully placed this entire net amount into their own bank accounts.  
13

14           26. That during the time Gemmill worked with Brittanya, Gemmill's OnlyFans  
15 account earned gross income of approximately \$95,215.06, from which a net amount was paid out  
16 by OnlyFans totaling approximately \$76,172.04. Upon information and belief, Defendants  
17 wrongfully placed this entire net amount into their own bank accounts.

18           27. That during the time Hanford worked with Brittanya, Hanford's OnlyFans account  
19 earned gross income of approximately \$132,155.38, from which a net amount was paid out by  
20 OnlyFans totaling approximately \$105,724.18. Upon information and belief, Defendants  
21 wrongfully placed this entire net amount into their own bank accounts.  
22

23           28. That Each Plaintiff terminated their respective relationships with Brittanya in or  
24 about January 2021.

25           29. That promptly after Brittanya was terminated by Plaintiffs, she began actively  
26 sabotaging Plaintiffs' income streams from OnlyFans as well as Plaintiffs' overall careers.  
27  
28

1           30. That, for example, Brittanya refused to turn over the passwords and control of  
2 Plaintiffs' respective OnlyFans and Instagram accounts. Instead, Brittanya removed all content  
3 from these pages and replaced them with content from other women Brittanya was managing.

4           31. That, as another example, once in control of her OnlyFans page, Gemmill began  
5 posting new content, as OnlyFans was her sole source of income. That upon information and  
6 belief almost immediately thereafter, Brittanya sent multiple frivolous takedown notices to  
7 OnlyFans under the Digital Millennium Copyright Act (17 U.S.C. § 512), falsely attesting under  
8 penalty of perjury that she had a good faith belief that the works on Gemmill's page were  
9 infringing on Brittanya's copyrights. As a direct result, Gemmill's OnlyFans account was  
10 terminated by OnlyFans, causing Gemmill to lose her sole source of income.

11           32. That ultimately, Plaintiffs regained control and access to their OnlyFans accounts.  
12 Only at that point did Plaintiffs become aware of how much money they had earned and how  
13 much Brittanya had wrongfully taken from them. Plaintiffs were unable to get their Instagram  
14 accounts back.

15  
16  
17 **FIRST CAUSE OF ACTION**

18 **FRAUD/MISREPRESENTATION**

19 **(By All Plaintiffs Against All Defendants)**

20           33. That Plaintiffs incorporate by reference paragraphs 1 through 32 as though fully  
21 set forth herein.

22           34. That Brittanya falsely represented to Plaintiffs that she would take a fifty percent  
23 (50%) management commission in exchange for Brittanya's assistance in creating, promoting and  
24 exploiting Plaintiffs' content on OnlyFans.

25           35. That Brittanya knew and/or believed these representations were false when she  
26 made them.  
27  
28

36. That Brittanya's misrepresentations were made with the intent to induce Plaintiffs to allowing Brittanya to set up and control their OnlyFans accounts.

37. That Plaintiffs justifiably relied upon Brittany's misrepresentations. In particular, Plaintiffs believed Brittany's misrepresentations and, as a direct result, allowed Brittany to set up and control their OnlyFans accounts.

38. That after gaining such access, Defendants, and each of them, wrongfully placed all money paid out by Plaintiffs' OnlyFans accounts directly into Defendants' own bank accounts.

39. That as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs have been injured in an amount in excess of \$15,000.00, the exact amount to be proven at the time of trial.

40. That the acts of the Defendants, and each of them, were done wilfully, with malice and oppression, and with a conscious disregard for Plaintiffs' rights and, therefore, Plaintiffs are entitled to recover punitive damages in an amount deemed appropriate to punish the Defendants, and each of them, for their wrongful and egregious conduct.

## SECOND CAUSE OF ACTION

## CONVERSION

**(By All Plaintiffs Against All Defendants)**

41. That Plaintiffs incorporate by reference paragraphs 1 through 40 as though fully set forth herein.

42. That Plaintiffs were entitled to the money earned and paid from their OnlyFans pages.

43. That Defendants, and each of them, substantially interfered with Plaintiffs' property by knowingly and intentionally taking possession of their money directly from OnlyFans.

44. That Plaintiffs did not consent to Defendants taking their money.

45. That Defendants' conduct was in derogation, exclusion and/or defiance of Plaintiffs' title and/or rights in the personal property.

46. That as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs have been injured in an amount in excess of \$15,000.00, the exact amount to be proven at the time of trial.

47. That the acts of the Defendants, and each of them, were done wilfully, with malice and oppression, and with a conscious disregard for Plaintiffs' rights and, therefore, Plaintiffs are entitled to recover punitive damages in an amount deemed appropriate to punish the Defendants, and each of them, for their wrongful and egregious conduct.

### **THIRD CAUSE OF ACTION**

## UNJUST ENRICHMENT

**(By All Plaintiffs Against All Defendants)**

48. That Plaintiffs incorporate by reference paragraphs 1 through 47 as though fully set forth herein.

49. That Defendants have been unjustly enriched by retaining the money of Plaintiffs against the fundamental principles of justice or equity, and good conscience, all to the detriment of Plaintiffs.

50. That as a direct and proximate result of the actions of the Defendants, and each of them, Plaintiffs have been injured in an amount in excess of \$15,000.00, the exact amount to be proven at the time of trial.

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1           51. That the acts of the Defendants, and each of them, were done wilfully, with malice  
2 and oppression, and with a conscious disregard for Plaintiffs' rights and, therefore, Plaintiffs are  
3 entitled to recover punitive damages in an amount deemed appropriate to punish the Defendants,  
4 and each of them, for their wrongful and egregious conduct.

5  
6                           **FOURTH CAUSE OF ACTION**

7                           **BREACH OF ORAL CONTRACT**

8                           **(By All Plaintiffs Against Brittany)**

9           52. That Plaintiffs incorporate by reference paragraphs 1 through 51 as though fully  
10 set forth herein.

11           53. That each Plaintiff individually entered into a valid and enforceable oral contract  
12 with Brittany.

13           54. That under the terms of the contract, Brittany would manage each Plaintiff's  
14 OnlyFans account in return for a fifty percent (50%) management commission.

15           55. That each Plaintiff did all of the material things the contract required her to do,  
16 and/or was excused of her obligation to do so.

17           56. That Brittany failed to abide by her obligations under the contract, which was a  
18 material breach of the contract. In particular, Brittany in conjunction with the other Defendants  
19 wrongfully took money from Plaintiffs that were not due to Defendants under the contract.  
20

21           57. That as a direct and proximate result of the actions of Brittany, Plaintiffs have  
22 been injured in an amount in excess of \$15,000.00, the exact amount to be proven at the time of  
23 trial.  
24

25 ///

26 ///

27 ///

**FIFTH CAUSE OF ACTION**

**BREACH OF THE IMPLIED COVENANT**

**OF GOOD FAITH AND FAIR DEALING**

**(By All Plaintiffs Against Brittanya)**

58. That Plaintiffs incorporate by reference paragraphs 1 through 57 as though fully set forth herein.

59. That Nevada law provides that in every contract and agreement there is an implied covenant of good faith and fair dealing.

60. That each Plaintiff did all of the significant things that her contract required her to do, and/or was excused from having to do those things.

61. That Brittanya owed a duty of good faith to the Plaintiffs.

62. That Brittanya breached her duty of good faith by wrongfully taking monies from the Plaintiffs in a manner that was unfaithful to the purpose of the contract.

63. That as a direct and proximate result of the actions of Brittanya, Plaintiffs have been injured in an amount in excess of \$15,000.00, the exact amount to be proven at the time of trial.

**SIXTH CAUSE OF ACTION**

**ALTER EGO ALLEGATIONS**

**(Plaintiffs against All Defendants)**

64. That Plaintiffs incorporate by reference paragraphs 1 through 63 as though fully set forth herein.

65. That upon information and belief, at all relevant times herein, Defendants, and each of them including DOES 1-10, were the agent, representative, servant, independent contractor, subcontractor, partner, joint venture, alter ego, successor in interest, affiliate, parent

1 and/or subsidiary, employee and/or franchise of each of the remaining Defendants, and each of  
2 them herein, and were at all times acting within the purpose and scope of said agency, service,  
3 employment, partnership, joint venture, parent/subsidiary, and franchise as such and with the  
4 express and/or implied permission, knowledge, consent, and ratification of all other said  
5 Defendants.

6  
7 66. That upon information and belief, at all relevant times herein, Defendants, and  
8 each of them including DOES 1-10, were the alter egos of each of the other Defendants named  
9 herein.

10 67. That upon information and belief, at all relevant times herein, Defendants, and  
11 each of them including DOES 1-10, acted in concert and with such a unity of interest, ownership,  
12 and control that their separate corporate identities are a sham and should be disregarded and each  
13 should be held legally responsible for the conduct of the others.

14  
15 68. That upon information and belief, at all relevant times herein, DG Media and  
16 Meow Gang were inadequately capitalized and failed to abide by the formalities of corporate  
17 existence. Upon information and belief, at all relevant times herein, Brittany, Marcello and  
18 DOES 1-10, and each of them, used DG Media and Meow Gang's assets as their own.

19 69. That upon information and belief, at all relevant times herein, Defendants, and  
20 each of them, were, as applicable, the principal, owner, director, officer, managing member,  
21 shareholder, member, central figure, and/or representative of DG Media and Meow Gang, and  
22 that they authorized, approved, directed, controlled, ratified, participated in, instigated, and/or  
23 was otherwise the moving, active, central, and/or conscious force of figure behind the unlawful  
24 activity alleged herein.

25  
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27  
28 ///

1           70. That upon information and belief, at all relevant times herein, DG Media and  
2 Meow Gang were the alter ego of Brittanya, Marcello and DOES 1-10 (and vice-versa) because  
3 there was a unity of interest and ownership between them, such that their separate personalities no  
4 longer existed and any failure to disregard the corporate form would result in a fraud or injustice.

5           71. That upon information and belief, at all relevant times, Defendants and DOES 1-  
6 10 acted as the principal, agent, and/or representatives of each other. Any action by one of them  
7 was within the course and scope of the agency relationship between them and was with the  
8 permission, ratification, and/or authorization of each other.

9           72. That as a direct and proximate result of the actions of the Defendants, and each of  
10 them, Plaintiffs have been injured in an amount in excess of \$15,000.00, the exact amount to be  
11 proven at the time of trial.

12  
13  
14                                   **SEVENTH CAUSE OF ACTION**

15                                   **Civil Conspiracy**

16           73. That Plaintiffs incorporate by reference paragraphs 1 through 72 as though fully  
17 set forth herein.

18           74. That Defendants, and each of them, agreed and intended to accomplish an  
19 unlawful objective for the purpose of harming the Plaintiffs as set forth herein.

20           75. That Plaintiffs sustained damage resulting from the Defendants' wrongful conduct  
21 as set forth herein.

22           76. That as a direct and proximate result of the actions of the Defendants, and each of  
23 them, Plaintiffs have been injured in an amount in excess of \$15,000.00, the exact amount to be  
24 proven at the time of trial.

25  
26           ///

27           ///  
28

**ATTORNEY'S FEES**

Plaintiffs have been required to retain the law offices of E. Brent Bryson, Ltd., Michael W. Fattorosi, P.C. and Kuznetsky Law Group, P.C. to prosecute this action. Plaintiffs are hereby entitled to reasonable attorneys' fees and costs incurred herein.

**REQUEST FOR RELIEF**

WHEREFORE, Plaintiffs pray as follows:

1. For compensatory damages in an amount in excess of \$15,000.00;
2. For punitive damages in an amount as deemed appropriate to punish or set an example of Defendants;
4. For interest on all sums according to law;
5. For attorney's fees;
6. For costs of suit incurred herein; and
7. For such other and further relief as the Court deems just and proper.

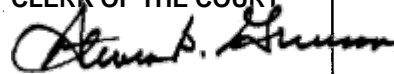
DATED this 9<sup>th</sup> day of June, 2021.

E. BRENT BRYSON, LTD.

BY: /s/ E. Brent Bryson  
E. BRENT BRYSON, ESQ.  
Nevada Bar No.: 004933  
3202 West Charleston Blvd.  
Las Vegas, Nevada 89102  
*Attorneys for Plaintiffs*

# **EXHIBIT B**

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Steven D. Grierson  
CLERK OF THE COURT


**EXMT (CIV)**

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Nevada Bar No.: 004933  
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Ebbesqltd@yahoo.com  
*Attorneys For Plaintiffs*

MICHAEL W. FATTOROSI, ESQ.  
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LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
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*Pro Hac Vice Application Pending*

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
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210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
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PH: (818) 753-2450  
FAX: (818) 736-0999  
*Pro Hac Vice Application Pending*

**DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual;  
YOUREE GEMMILL, an individual;  
and PATHAMAWAN HANFORD,  
an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI;  
MARCELLO RAZAVI; MEOW  
GANG PRODUCTION STUDIOS,  
INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.;  
and DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XIX

**EX PARTE MOTION FOR ORDER**  
**DIRECTING THE ISSUANCE OF A**  
**PREJUDGMENT WRIT OF ATTACHMENT**  
**WITHOUT NOTICE**

///

///

COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter "Colvin"), YOUREE GEMMILL (hereinafter "Gemmill"), and PATHAMAWAN HANFORD (hereinafter "Hanford"), by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of Kuznetsky Law Group, P.C., and move this court, without notice and hearing, pursuant to NRS Chapter 31, for an order directing the issuance of a prejudgment writ of attachment without notice. This Motion is made and based upon the following Memorandum of Points and Authorities and the Affidavits of Plaintiff, Lauren Colvin and Michael W. Fattorosi, Esq.

DATED this 10<sup>th</sup> day of June, 2021.

E. BRENT BRYSON, LTD.

By: /s/ E. Brent Bryson  
 E. BRENT BRYSON, ESQ.  
 Nevada Bar No.: 4933  
 3202 West Charleston Blvd.  
 Las Vegas, NV 89102  
*Attorney for Plaintiffs*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. FACTS**

This is an action brought by the Plaintiffs against the Defendants as a result of the Defendants' wrongfully taking monies that rightfully belonged to the Plaintiffs.

That from approximately July 2020 to January 2021, Defendant, Brittanya Razavi (hereinafter "Brittanya"), aided and abetted by Defendants Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., fraudulently embezzled all net income earned by Plaintiffs. In particular, Defendants embezzled \$473,445.10 from Colvin, \$38,086.02 from Gemmill, and \$52,862.09 from Hanford. When the fraud was discovered, Brittanya terminated all contact with the Plaintiffs and refused to return the embezzled funds. As



such, Defendants, and each of them, are liable for fraud, conversion, and unjust enrichment which may include a recovery of punitive damages under NRS 42.005(1) and attorneys' fees. Plaintiffs in this matter seeks compensatory and punitive damages totaling \$2,584,728.51. Additionally, Plaintiffs have recently learned the Defendants are in the process of searching for real estate to purchase worth approximately four million dollars (\$4,000,000) cash. Such cash payment it is asserted upon information and belief would include all of the money embezzled from Plaintiffs.

## II. STATEMENT OF LAW

NRS 31.017 authorizes this Court to order the Clerk to issue a writ of attachment, without notice and hearing. NRS 31.017 states in pertinent part:

The court may order the writ of attachment issued without notice to the defendant only in the following cases:

...

(3) In an action for the recovery of the value of personal property, where such personal property is owned by the plaintiff and has been taken or converted by the defendant without the consent of the plaintiff.

...

(5) Where the defendant is about to give, assign, hypothecate, pledge, dispose of or conceal the defendant's money or property or any part thereof and the defendant's money or property remaining in this State or that remaining unconcealed will be insufficient to satisfy the plaintiff's claim.

(6) In an action for the recovery of money or property, or the proceeds thereof, obtained from the plaintiff by the defendant through embezzlement, forgery, larceny or extortion.

In the instant case, a prejudgment Writ of Attachment is necessary to preserve Plaintiffs' rights because Defendants are actively seeking to spend all of their available cash and all funds embezzled from Plaintiffs, which would make Defendants judgment-proof and deprive Plaintiffs of a recovery. A prejudgment Writ of Attachment is expressly authorized by three separate and disjunctive subsections of NRS 31.017, in that (1) Plaintiffs seek to recover a specific amount of funds converted by Defendants (subsection 3); (2) Defendants are about to hypothecate/dispose of Plaintiffs' money to purchase real estate (subsection 5); and (3) Plaintiffs seek to recover funds that

1 were fraudulently embezzled from them (subsection 6).

2 In particular, Plaintiffs are concerned with the money within Defendants' bank accounts  
3 located at Chase Bank, as well as real property located in Las Vegas.

4 The attached Affidavit of Plaintiff Lauren Colvin meets the requirement of NRS 31.020(2).  
5

6 **CONCLUSION**

7 Based upon the foregoing, Plaintiffs respectfully request that the Court order a Writ of  
8 Attachment to issue and attach property located within the greater metropolitan area of Las Vegas,  
9 Nevada, bank accounts and/or safety deposit boxes, including, but not limited to, Chase Bank, in  
10 the names of Brittanya Razavi, Marcello Razavi, Meow Gang Production Studios, Inc., DG Media  
11 & Entertainment Group, Inc., and any entities which either Brittanya Razavi and/or Marcello  
12 Razavi directs or is a signatory upon.  
13

14 DATED this 10<sup>th</sup> day of June, 2021.

15 E. BRENT BRYSON, LTD.

16 By: /s/ E. Brent Bryson  
17 E. BRENT BRYSON, ESQ.  
18 Nevada Bar No.: 4933  
19 3202 West Charleston Blvd.  
20 Las Vegas, NV 89102  
21 *Attorneys for Plaintiffs*  
22  
23  
24  
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**AFFIDAVIT OF PLAINTIFF LAUREN COLVIN**

STATE OF NEVADA           )  
  ) ss:  
COUNTY OF CLARK        )

Lauren Colvin, being first duly sworn, under penalty of perjury, deposes and says:

1. That Affiant is a Plaintiff in an action now pending in the Eighth Judicial District Court, Clark County, Nevada. That Affiant makes this Affidavit of facts personally known by her and to which she would be competent to testify in a court of law.

2. During the period of July 2020 to January 2021, Affiant worked with Brittanya Razavi for the purposes of creating, promoting and exploiting pornographic content of affiant on the OnlyFans website. Pursuant to our agreement, Razavi was to earn a commission of 50% of all net income earned from affiant's OnlyFans account. However, after Razavi set up the account, she refused to give me access or even show me the accountings of what was earned. Subsequently Razavi fraudulently embezzled all net income directly into her and/or the other Defendants bank accounts, including at Chase Bank.

3. During the period of July 2020 to January 2021, Brittanya Razavi, aided and abetted by Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., embezzled 100% of the net income earned by Affiant from OnlyFans by directly transferring it into Defendants' bank accounts, including at Chase Bank. Such total net income earned by Affiant was worth \$946,890.20.

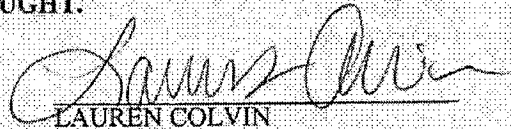
4. When Affiant contacted Razavi about the embezzled amounts, Razavi terminated all contact with affiant.

5. Said money of Affiant has been and continues to be wrongfully detained. Therefore, Affiant has a valid claim for fraud, conversion, and unjust enrichment.

6. On or about August 2020, Affiant learned that Brittanya and Marcelo Razavi are actively looking to purchase residential real estate in Las Vegas, Nevada, for cash, worth approximately four million dollars.

1           7. To the best of Affiant's knowledge, Brittany and Marcelo Razavi intend to use all  
2 the money embezzled from affiant and the other Plaintiffs in this case to purchase property for four  
3 million dollars. Upon information and belief, the ownership of such property will then be  
4 transferred into a trust.

5           **FURTHER, AFFIANT SAYETH NAUGHT.**

6  
7   
8 LAUREN COLVIN

9 Subscribed and sworn to before me  
10 this \_\_\_\_ day of \_\_\_\_\_, 2021.

11 \_\_\_\_\_  
12 Notary Public in and for said  
13 County and State  
14  
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**JURAT**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

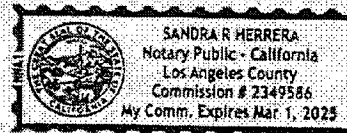
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 2 day of June

2021 by Lauren Colvin

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Sandra R. Herrera  
Signature (Seal)

**OPTIONAL INFORMATION****DESCRIPTION OF THE ATTACHED DOCUMENT**

Affidavit of  
(Title or description of attached document)

Plaintiff Lauren Colvin  
(Title or description of attached document continued)

Number of Pages \_\_\_\_\_ Document Date \_\_\_\_\_

Additional Information \_\_\_\_\_

**INSTRUCTIONS**

The wording of all Jurats completed in California after January 1, 2015 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain the proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and county information must be the state and county where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of the document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
  - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
  - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document with a staple.

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

That he is an attorney licensed to practice law in the State of California and his application to appear in this action *pro hac vice* is following.

2. To the best of Affiant's knowledge, during the period of July 2020 to January 2021, Brittanya Razavi, aided and abetted by Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., embezzled 100% of the net income earned by Plaintiffs Lauren Colvin, Youree Gemmill, and Pathamawan Hanford by directly transferring monies into Defendants' bank accounts, including at Chase Bank. Such total net income embezzled was worth \$946,890.20.

3. Brittany and Marcelo Razavi have purchased and own at least four residential properties in Las Vegas Nevada. To the best of Affiant's knowledge, each of these properties were purchased in cash and initially transferred into a trust to shield them from their personal liability. Such properties include the following:

a. 8956 Aurora Bay Court, Las Vegas, Nevada; currently owned by Razavi Brittany McCall Revocable Living Trust dated April 1, 2019, for which Brittany Razavi is the trustee;

///

b. 9303 Gilcrease Avenue, Unit 1, Las Vegas, Nevada; currently owned by Razavi Brittanya McCall Revocable Living Trust dated April 1, 2019, for which Brittany Razavi is the trustee;

c. 9522 Michelle Falls Avenue, Las Vegas, Nevada; previously owned by The Brittanya McCall Razavi Revocable Spenthrift Trust dated April 1, 2019, for which Brittany Razavi was the trustee; and currently owned by 3725 Seneca Highlands LLC, a Nevada limited liability company, for which Brittanya Razavi is the managing member; and

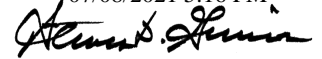
d. 10550 West Alexander Road, Unit 2130, Las Vegas, Nevada; currently owned by Family Faith Fortune Irrevocable Trust, dated April 28, 2017, with Marcello Razavi listed as a trustee.

**FURTHER, AFFIANT SAYETH NAUGHT.**

~~MICHAEL W. FATTOROSI~~

# EXHIBIT C





CLERK OF THE COURT

**OGM (CIV)**

E. BRENT BRYSON, ESQ.

Nevada Bar No.: 004933

E. BRENT BRYSON, LTD.

3202 West Charleston Blvd.

Las Vegas, Nevada 89102

PH: (702) 364-1234

FAX: (702) 364-1442

Ebbesqltd@yahoo.com*Attorneys For Plaintiffs*

MICHAEL W. FATTOROSI, ESQ.

California State Bar No.: 193538

LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.

5850 Canoga Avenue, 4th Floor

Woodland Hills, California 91367

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*Pro Hac Vice Application Pending*

MICHAEL D. KUZNETSKY, ESQ.

California State Bar No.: 241045

KUZNETSKY LAW GROUP, P.C.

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Burbank, California 91505

mike@kuzlaw.com

PH: (818) 753-2450

FAX: (818) 736-0999

*Pro Hac Vice Application Pending***DISTRICT COURT****CLARK COUNTY, NEVADA**LAUREN COLVIN, an individual;  
YOUREE GEMMILL, an individual;  
and PATHAMAWAN HANFORD,  
an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI;  
MARCELLO RAZAVI; MEOW  
GANG PRODUCTION STUDIOS,  
INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.;  
and DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XIX

**PLAINTIFFS' PROPOSED ORDER GRANTING  
PLAINTIFFS' EX PARTE MOTION FOR  
ORDER DIRECTING THE ISSUANCE OF A  
PREJUDGMENT WRIT OF ATTACHMENT  
WITHOUT NOTICE**

///

///

1 COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter "Colvin"), YOUREE  
2 GEMMILL (hereinafter "Gemmill"), and PATHAMAWAN HANFORD (hereinafter "Hanford"),  
3 by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd.,  
4 Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of  
5 Kuznetsky Law Group, P.C., and hereby submits their PROPOSED ORDER GRANTING  
6 PLAINTIFFS' EX PARTE MOTION FOR ORDER DIRECTING THE ISSUANCE OF A  
7 PREJUDGMENT WRIT OF ATTACHMENT WITHOUT NOTICE. This Court, after reviewing  
8 the aforementioned matter and having good cause, hereby orders the following:  
9

10 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiffs' Ex Parte  
11 Motion For An Order Directing The Issuance Of A Prejudgment Writ Of Attachment Without  
12 Notice is hereby GRANTED.  
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1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendants' bank  
2 accounts and/or safety deposit boxes in the names of Brittanya Razavi, Marcello Razavi, Meow  
3 Gang Production Studios, Inc., and/or DG Media & Entertainment Group, Inc. located at Chase  
4 Bank are hereby frozen and that no funds may be removed by anyone except by court order.

5 IT IS SO ORDERED.

6 DATED this 8<sup>th</sup> day of July, 2021.

7  
8  
9 Dated this 8th day of July, 2021


10 

11 THE HONORABLE JUDGE CRYSTAL ELLER

12 7AA AFA 53AA E7A5  
Crystal Eller  
District Court Judge

13 Respectfully Submitted by:

14 E. BRENT BRYSON, LTD.

15 

16 E. BRENT BRYSON, ESQ.

17 Nevada Bar No.: 004933

18 3202 W. Charleston Blvd.

19 Las Vegas, NV 89102

20 (702) 364-1234 Telephone

21 (702) 364-1442 Facsimile

22 Ebbesqltd@yahoo.com

23 *Attorneys for Plaintiffs*

CSERV

DISTRICT COURT  
CLARK COUNTY, NEVADA

Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

vs.

DEPT. NO. Department 19

Brittanya Razavi, Defendant(s)

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 7/8/2021

Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
E. Brent Bryson	EBBESQLTD@YAHOO.COM
E. BRYSON	ebbesqltd@yahoo.com
Michael Fattorosi	Michael@fattlegal.com
Michael Fattorosi	Michael@fattlegal.com
E. Bryson	EBBESQLTD@YAHOO.COM
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
Michael Kuznetsky	Mike@kuzlaw.com
Michael Kuznetsky	Mike@kuzlaw.com

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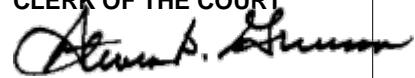
E. Bryson

ebbesqltd@yahoo.com

**EXHIBIT D**  
**(FILED UNDER SEAL)**

# EXHIBIT E

Electronically Filed  
7/20/2021 7:58 AM  
Steven D. Grierson  
CLERK OF THE COURT



**Marquis Aurbach Coffing**  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
*Attorneys for Defendants*

# **DISTRICT COURT**

## **CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Case No.: A-21-836019-C  
Dept. No.: XIX

Plaintiffs,

vs.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.; and DOES  
1-10 inclusive,

Defendants.

## **NOTICE OF APPEARANCE**

Please take that the law firm of Marquis Aurbach Coffing is appearing as Counsel of  
Record for Defendants BRITTANYA RAZAVI, MARCELLO RAZAVI, MEOW GANG  
PRODUCTION STUDIOS, INC. and DG MEDIA & ENTERTAINMENT GROUP, INC.

Dated this 20th day of July, 2021.

MARQUIS AURBACH COFFING

By /s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for Defendants*



MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NOTICE OF APPEARANCE** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 20th day of July, 2021. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:<sup>1</sup>

E. Brent Bryson, Esq.  
E. BRENT BRYSON, LTD.  
3202 West Charleston Blvd.  
Las Vegas, Nevada 89102  
Email: ebbesqltd.com

Michael W. Fattorosi, Esq.  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4th Floor  
Woodland Hills, California 91367  
Email: michael@fattlegal.com  
*Pro Hac Vice Application Pending*

Michael D. Kuznetsky, Esq.  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
Email: mike@kuzlaw.com  
*Pro Hac Vice Application Pending*

*Attorneys For Plaintiffs*

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

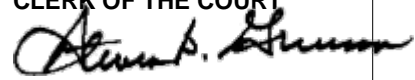
N/A

/s/ Rosie Wesp  
an employee of Marquis Aurbach Coffing

<sup>1</sup> Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

# EXHIBIT F

Electronically Filed  
7/20/2021 7:58 AM  
Steven D. Grierson  
CLERK OF THE COURT



**Marquis Aurbach Coffing**  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
*Attorneys for Defendants*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Case No.: A-21-836019-C  
Dept. No.: XIX

Plaintiffs,

vs.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.; and DOES  
1-10 inclusive,

Defendants.

**INITIAL APPEARANCE FEE DISCLOSURE**

Pursuant to NRS Chapter 19, as amended by Senate Bill 106, filing fees are submitted for parties appearing in the above-entitled action as indicated below:

BRITTANYA RAZAVI .....	\$223.00
MARCELLO RAZAVI .....	\$30.00
MEOW GANG PRODUCTION STUDIOS, INC.....	\$30.00
DG MEDIA & ENTERTAINMENT GROUP, INC. ....	\$30.00

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MARQUIS AURBACH COFFING

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(702) 382-0711 FAX: (702) 382-5816

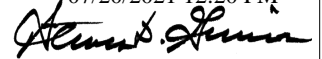
1 TOTAL REMITTED..... \$313.00

2 Dated this 20th day of July, 2021.

3 MARQUIS AURBACH COFFING

4  
5 By /s/ Nick D. Crosby  
6 Nick D. Crosby, Esq.  
7 Nevada Bar No. 8996  
8 10001 Park Run Drive  
9 Las Vegas, Nevada 89145  
10 *Attorneys for Defendants*

# **EXHIBIT G**



CLERK OF THE COURT

**Marquis Aurbach Coffing**

Nick D. Crosby, Esq.

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Las Vegas, Nevada 89145

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Facsimile: (702) 382-5816

ncrosby@maclaw.com

Attorneys for Defendants B. Razavi, M.

Razavi, Meow Gang Production Studios,

Inc. and DG Media &amp; Entertainment

Group, Inc.

**DISTRICT COURT****CLARK COUNTY, NEVADA**LAUREN COLVIN, an individual; YOREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD; an individual;

Case No.: A-21-836019-C

Dept. No.: XIX

Plaintiffs,

vs.

**HEARING REQUESTED**

HEARING SET

Date: Aug. 3, 2021

Time: 9:30 AM

BMT

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.; and DOES  
1-10 inclusive;

Defendants.

**DEFENDANTS' MOTION TO VACATE ORDER OR, ALTERNATIVELY,  
DISCHARGE PREJUDGMENT WRIT OF ATTACHMENT ON ORDER SHORTENING  
TIME**

Defendants Brittanya Razavi ("Brittanya"), Marcello Razavi ("Marcello"), Meow Gang Production Studios, Inc. ("Meow") and DG Media & Entertainment Group, Inc. ("DG") (collectively "Defendants"), by and through their counsel of record, Nick D. Crosby, Esq. of Marquis Aurbach Coffing, hereby file their Motion to Vacate Order or, Alternatively, Discharge Pre-Judgment Writ of Attachment on Order Shortening Time.

This Motion is made and based upon the attached memorandum of points and authorities, all papers and pleadings on file herein, and any oral argument permitted by the Court at a hearing on the matter.

Dated this 19<sup>th</sup> day of July, 2021.

MARQUIS AURBACH COFFING

By /s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Attorney(s) for Defendants

**ORDER SHORTENING TIME**

Upon the Declaration of Nick D. Crosby, Esq., and good cause appearing therefore,

IT IS HEREBY ORDERED, ADJUDGED, and DECREED that the time for hearing of the above-entitled matter will be shortened and will be heard on the 3<sup>rd</sup> day of August, 2021, at the hour of 9:30 AM .m. in Department 19 of the Eighth Judicial District Court, located at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada 89155. Opposition due NLT 07.26.2021; 3PM.  
Reply due NLT 07.29.2021; 3PM \*\*

Dated this 20th day of July, 2021



DISTRICT COURT JUDGE

**CB8 118 7830 E999**  
**Crystal Eller**  
**District Court Judge**

Submitted by:

MARQUIS AURBACH COFFING

\*\*

'In-person' appearances permitted. However, parties may appear remotely via Blue Jeans (info below).

By /s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Attorney(s) for Defendants

Phone #: 408.419.1715

Session ID: 583 879 418

Link: <https://bluejeans.com/583879418>

**DECLARATION OF NICK D. CROSBY, ESQ.**  
**IN SUPPORT OF ORDER SHORTENING TIME**

Nick D. Crosby, Esq. declares as follows:

1. I am a shareholder with the law firm of Marquis Aurbach Coffing, counsel for Brittanya Razavi (“Brittanya”), Marcello Razavi (“Marcello”), Meow Gang Production Studios, Inc. (“Meow”) and DG Media & Entertainment Group, Inc. (“DG”) (collectively “Defendants”), in the above-stated action.

2. I am duly licensed to practice law in the State of Nevada and have personal knowledge of and I am competent to testify concerning the facts herein.

3. Upon information and belief, on or about July 13, 2021, an Order Granting Plaintiffs’ Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment (“Order”) was executed on Chase Bank for the bank accounts of the Defendants. **(Exhibit F)**. The Order was filed with the Court on July 8, 2021.

4. As of the date of this Declaration, there is no Notice of Entry of Order filed with the Court for the Order.

5. The Defendants were never provided a copy of a Writ of Execution or a Writ of Attachment as of the date of this Declaration.

6. Defendants learned of the Order in the early morning hours of July 15, 2021 when Defendant Marcello noticed the business account balances showed a negative balance.

7. Upon information and belief, on July 15, 2021, Marcello visited a Chase Bank branch to determine why the accounts were showing a negative balance. Marcello was provided copies of a 21-page fax from Chase Bank, which was dated July 13, 2021, entitled “Legal Papers Fax/Scan Cover Sheet”, which included a copy of the Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice, consisting of nine pages, and a copy of the Order with the certificate of service, as well as an Affidavit of Plaintiff Lauren Colvin (“Colvin”) and an unacknowledged Affidavit of attorney Michael W. Fattorosi (“Fattorosi”).

8. Upon information and belief, on July 16, 2021 Defendants learned that their



1 personal accounts had been frozen as well.

2 9. As a result of the execution of the Order, upon information and belief, Chase  
3 Bank froze seven bank accounts – four accounts of Meow and two accounts of DG, as well as  
4 the personal bank accounts of Marcello and Brittanya.

5 10. As a result of the Order, upon information and belief, Meow and DG are unable to  
6 access any funds at Chase Bank and, therefore, cannot operate their respective businesses, to  
7 include paying vendors, making business purchases for promotions from other social media  
8 influencers, utilities on its studio or travel to provide new environments for its on-line content, to  
9 name a few business activities.

10 11. Further, upon information and belief, Marcello receives wages from DG and  
11 Brittanya from Meow and, because no financial activity can occur as a result of the frozen  
12 accounts, neither Marcello nor Brittanya can receive their wages.

13 12. Likewise, upon information and belief, Marcello and Brittanya are unable to  
14 access their personal funds at Chase Bank as a result of the Order. Marcello and Brittanya have  
15 two young children, ages 10 and 8, one of which has been diagnosed with Autism, for whom  
16 they care for. Without access to any of their funds which are frozen at Chase Bank, Marcello  
17 and Brittanya's ability to provide for their family is drastically and severely impacted.

18 13. I reviewed the Court docket on July 15 and 16, 2021 and did not see any filing of  
19 a proof of surety or bond for the issuance of a Writ of Attachment.

20 14. Defendants have not been served with any complaint.

21 15. Because Meow and DG cannot operate without access to the Chase Bank  
22 account or its frozen funds, and Marcello and Brittanya receive compensation from these  
23 companies, and because the personal accounts of Marcello and Brittanya are frozen, good cause  
24 exists to hear this matter on shortened time.

25 ///

26 ///

27 ///

28 ///

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 19th day of July, 2021.

/s/ Nick D. Crosby  
Nick D. Crosby, Esq.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. INTRODUCTION**

Plaintiffs have frozen all of Defendants' funds at Chase Bank by virtue of a statutorily unlawful Order, which was issued based upon statutorily deficient evidence and improper process – *most notably, the lack of a written undertaking*. Plaintiffs provided the Court with incorrect and deficient affidavits in support of an ex parte writ of attachment without notice, which prompted the Court to issue an order for the same, which does not, in any way, comply with the statutory requirements for such an order. Plaintiffs then, *without filing any written undertaking with two or more sureties, which is required under the statute*, served the Order on Chase Bank and froze all of Defendants' bank accounts. The Defendants were never served with a Notice of Execution, have never seen a Writ of Attachment, and the Court docket shows that Plaintiffs never filed a written undertaking with the Court. As such, the Order should be vacated or, if a writ of attachment exists, the same should be discharged.

### **II. STATEMENT OF RELEVANT FACTS**

#### **A. THE PARTIES.**

Marcello Razavi ("Marcello") is an officer, owner and employee of DG Media & entertainment Group, Inc. ("DG"). (**Exhibit A**, Dec. of M. Razavi, ¶ 2). Brittany Razavi ("Brittanya") is an officer, owner and employee of Meow Gang Production Studios, Inc. (Meow"). (**Exhibit B**, Dec. of B. Razavi, ¶ 2). Meow is a Nevada corporation with its principal place of business in Clark County, Nevada. (Id.) DG is a Nevada corporation with its principal place of business in Clark County, Nevada. (**Exh. A** at ¶ 2). Marcello and Brittany have two

1 children together, ages 10 and 8, one of whom has been diagnosed with Autism. (**Exh. A** at ¶ 3;  
2 **Exh. B** at ¶ 3). Meow and DG provide, *inter alia*, services related to social media  
3 influencing/influencers and other branding, promotion and marketing services for on-line digital  
4 formats. (**Exh. A** at ¶ 5; **Exh. B** at ¶ 5).

5 Plaintiff Lauren Colvin (“Colvin”) worked with DG and Meow as a licensee pursuant to a  
6 Licensing Agreement (“LA”). (**Exhibit C**; **Exh. A** at ¶ 6; **Exh. B** at ¶ 6).<sup>1</sup> Colvin executed the  
7 LA between herself, DG and Meow on July 28, 2020. (Id. at p. 5). Pursuant to the LA, Colvin  
8 was given a license to use DG’s intellectual property; to wit: its OnlyFans.com account. (Id. at  
9 p. 1). DG retained exclusive ownership of the OnlyFans.com account pursuant to the express  
10 terms of the LA. (Id. at p. 2). Additionally, Colvin expressly agreed that Meow and DG were  
11 the sole owners of “any photos, videos, and artist social media handles (@got.lauryn and  
12 @laurenlovingyou)” which were created by DG and/or Meow. (Id.) Colvin was paid pursuant  
13 to the terms of the LA for her work with Defendants. (**Exh. A** at ¶ 7; **Exh. B** at ¶ 7). On or  
14 about January 2021, after separating her relationship with Defendants, Defendants discovered  
15 that the OnlyFans.com account(s) owned by DG which showcased Colvin were taken out of their  
16 control and Defendants have a reasonable belief Colvin was responsible for the conversation of  
17 DG’s OnlyFans.com account. (**Exh. A** at ¶ 8).

18 Plaintiff Youree Gemmill (“Gemmill”) worked with Defendants from approximately  
19 mid-October 2020 until January, 19 2021. (**Exh. A** at ¶ 9; **Exh. B** at ¶ 8). Gemmill did not have  
20 a licensing agreement like Colvin, but instead, Gemmill and Brittanya discussed compensation  
21 and reached an agreement with Gemmill, whereby Gemmill paid \$1,000 per month on a weekly  
22 basis. (**Exh. A** at ¶ 10; **Exh. B** at ¶ 9). Thereafter, Gemmill’s rate of compensation would  
23 increase after four months, though Gemmill did not last that long. (**Exh. A** at ¶ 10; **Exh. B** at ¶  
24 10). The compensation paid to Gemmill was for the content she provided for her online social  
25 media, which was created, branded and promoted by Defendants. (**Exh. B** at ¶ 11).

26  
27 <sup>1</sup> The LA contains confidential business rates, which Defendants cannot have disclosed publicly and, as  
28 such, move contemporaneously with this Motion a Motion to File the LA Under Seal.

Plaintiff Pathamawan Hanford (“Hanford”) had a similar arrangement as Colvin, whereby she was paid on a percentage basis. (**Exh. A** at ¶ 12; **Exh. B** at Id. at ¶ 12). Hanford was offered a licensing agreement, similar in form to Colvin’s, but with a different compensation agreement, but the same was never executed. (**Exh. A** at ¶ 13). Hanford executed an agreement with DG on July 14, 2020, which provided her written consent that DG had the right to take or use photographs of Hanford and released to DG all rights to the images. (**Exhibit D**; **Exh. A** at ¶ 14). Hanford worked with Defendants from July 2020 until January 2021. (**Exh. A** at ¶ 15; **Exh. B** at ¶ 13).

**B. THE ORDER FOR ISSUANCE OF PREJUDGMENT WRIT OF ATTACHMENT.**

According to the Court docket, Plaintiffs filed their Complaint against Defendants on June 9, 2021. The following day, Plaintiffs filed an Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice (“Motion for Prejudgment Writ”). (**Exhibit E**). Plaintiffs have not served Defendants with a copy of the summons and Complaint as of the date of this Motion.

On July 8, 2021, the Court issued an Order Granting Plaintiffs’ Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice (the “Order”). The Order states:

COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter “Colvin”), YOUNG GEMMILL (hereinafter “Gemmill”), and PATHAMAWAN HANFORD (hereinafter “Hanford”), by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of Kuznetsky Law Group, P.C., and hereby submits their PROPOSED ORDER GRANTING PLAINTIFFS’ EX PARTE MOTION FOR ORDER DIRECTING THE ISSUANCE OF A PREJUDGMENT WRIT OF ATTACHMENT WITHOUT NOTICE. This Court, after reviewing the aforementioned matter and having good cause, hereby orders the following:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff’s Ex Parte Motion For An Order Directing The Issuance Of A Prejudgment Writ Of Attachment Without Notice is hereby GRANTED.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendants’ bank accounts and/or safety deposit boxes in the names of Brittanya Razavi, Marcello Razavi, Meow Gang Productions Studios, Inc., and/or DG

Media & Entertainment Group, Inc. located at Chase Bank are hereby frozen and that no funds may be removed by anyone except by court order.

IT IS SO ORDERED.

DATED this 8<sup>th</sup> day of July, 2021.

(Exhibit F). As of the date of this Motion, Defendants have not been served with a copy of the Order by Plaintiffs.

### C. DEFENDANTS' DISCOVERY OF THE PLAINTIFFS' UNLAWFUL ACTION.

In the early morning hours of July 15, 2021, Marcello checked the Chase Bank accounts for DG and Meow via his mobile application and noticed that his accounts showed a negative balance. (Exh. A at ¶ 16). Later that day, Marcello visited a Chase Bank branch to inquire about the balances and was advised by a Chase Bank representative that the accounts were frozen as a result of a legal proceeding. (Id. at ¶ 17). Chase Bank provided Marcello copies of a 21-page fax/scan, which was dated July 13, 2021, entitled "Legal Papers Fax/Scan Cover Sheet", which included a copy of the Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice, consisting of nine pages, and a copy of the Order with the certificate of service, as well as an Affidavit of Colvin and an unacknowledged Affidavit of attorney Michael W. Fattorosi ("Fattorosi"). (Id. at ¶ 18). Chase Bank did not provide any other documents, including a Notice of Execution or writ of attachment, to Marcello, nor have any of the Defendants received the same. (Exh. A at ¶ 19; Exh. B at ¶ 16). On July 16, 2021 Marcello and Brittany learned that their personal accounts had been frozen as well. (Exh. A at ¶ 20; Exh. B at ¶ 17).

### III. LEGAL ARGUMENT

#### A. LEGAL STANDARD FOR ISSUANCE OF A WRIT OF PREJUDGMENT ATTACHMENT WITHOUT NOTICE.

Nevada Rule of Civil Procedure 64 allows for attachment in the manner provided by the law of the State, "[a]t the commencement of and during the course of an action ... for the purpose of securing satisfaction of the judgment ultimately to be entered in the action." Nevada

Revised Statute 31.010 allows a plaintiff at the time of issuing the summons, or at any time thereafter, to apply to the Court for an order directing the clerk to issue a writ of attachment that can be used to secure the satisfaction of any judgment that may be recovered. This section provides that:

The plaintiff at the time of issuing the summons, or at any time thereafter, may apply to the court for an order directing the clerk to issue a writ of attachment and thereby cause the property of the defendant to be attached as security for the satisfaction of any judgment that may be recovered, unless the defendant gives security to pay such judgment as provided in this chapter.

NRS 31.010.

Furthermore, NRS 31.017 permits a court to issue a writ of attachment without a notice to the defendant in the following cases:

1. In an action by a resident of this State against a defendant not residing in this State. For purposes of this subsection only, domestic corporations and foreign corporations who are doing business in this State and who have qualified to do business in this State as required in [chapter 80](#) of NRS shall be deemed residents of this State. Alien corporations and foreign corporations who have not qualified to do business shall be deemed nonresidents.

2. In an action upon a foreign judgment for the direct payment of money.

3. In an action for the recovery of the value of personal property, where such personal property is owned by the plaintiff and has been taken or converted by the defendant without the consent of the plaintiff.

4. In an action by a resident of this State, where the defendant is about to remove the defendant's money or property, or any part thereof, from this State, and the defendant's property which may remain within this State, if any, will be insufficient to satisfy plaintiff's claim. For purposes of this subsection only, a foreign corporation qualified to do business in this State as provided in [chapter 80](#) of NRS shall be deemed a resident of this State.

5. Where the defendant is about to give, assign, hypothecate, pledge, dispose of or conceal the defendant's money or property or any part thereof and the defendant's money or property remaining in this State or that remaining unconcealed will be insufficient to satisfy the plaintiff's claim.

6. In an action for the recovery of money or property, or the proceeds thereof, obtained from the plaintiff by the defendant through embezzlement, forgery, larceny or extortion.

7. In an action brought under [chapter 112](#) of NRS.

8. In an action by the State, or a political subdivision thereof, brought under [chapter 130](#) of NRS.

9. In an action where jurisdiction in this State can only be obtained by the attachment of the defendant's property.

Nev. Rev. Stat. 31.017.

In addition, all applications to the Court for an Order issuing a writ of attachment without notice to the defendant must be accompanied by an affidavit of the plaintiff or any other person having personal knowledge of the facts of the grounds upon which the attachment is based. Nev. Rev. Stat. 31.020. Specifically, the affidavit must include the following under the statute:

...

1. All applications to the court for an order directing the clerk to issue a writ of attachment without notice to the defendant shall be accompanied by the affidavit of the plaintiff or any other person having personal knowledge of the facts constituting one or more of the grounds for attachment, which affidavit or affidavits shall:

(a) Set forth clearly the nature of the plaintiff's claim for relief and that the same is valid.

(b) Set forth the amount which the affiant believes the plaintiff is entitled to recover from the defendant, and if there is more than one plaintiff or more than one defendant, the amount the affiant believes each plaintiff is entitled to recover or the amount that the plaintiff is entitled to recover from each defendant.

(c) Describe in reasonable and clear detail all the facts which show the existence of any one of the grounds for an attachment without notice to the defendant.

(d) Describe in reasonable detail the money or property sought to be attached and the location thereof if known.

(e) If the property sought to be attached is other than money, set forth to the best knowledge and information of the affiant, the value of such property less any prior liens or encumbrances.

(f) Name all third persons upon whom a writ of garnishment in aid of the writ of attachment will be served.

(g) In an action upon a foreign judgment attach a copy of the judgment to the affidavit for attachment as an exhibit.

(h) State whether, to the best information and belief of the affiant, the money or property sought to be attached is exempt from execution.

2. All applications to the court for an order directing the clerk to issue a writ of attachment with notice to the defendant shall be accompanied by an affidavit setting forth the item required by subsection 1, except that such affidavit may show the existence of any one of the grounds for attachment with notice.



1 Nev. Rev. Stat. 31.020.

2 Nevada Revised Statute 31.200 permits a defendant to move the court for discharge of a  
3 prejudgment writ of attachment based upon the following grounds:

4 ...

5 1. The defendant may also, at any time before trial, apply by motion, upon  
6 reasonable notice to the plaintiff, to the court in which the action is brought or to  
7 the judge thereof, for a discharge of the attachment, or the money or property  
8 attached through the use of a writ of garnishment, on the following grounds:

9 (a) That the writ was improperly or improvidently issued.

10 (b) That the property levied upon is exempt from execution or necessary and  
11 required by the defendant for the support and maintenance of the defendant and  
12 the members of the defendant's family.

13 (c) That the levy is excessive.

14 2. If the court or the judge thereof on the hearing of such motion shall find  
15 that any of the grounds stated in subsection 1 exist, the attachment and levy  
16 thereof shall be discharged. If the motion is based upon paragraph (c) of  
17 subsection 1 only, and the fact is found to exist, the discharge of attachment shall  
18 be only as to the excess.

19 Nev. Rev. Stat. 31.200. "Generally, when a defendant challenges the propriety of an attachment,  
20 the plaintiff bears the burden of demonstrating the propriety of the lien." Juan Gabriel Shows,  
21 LLC v. CME Enterprises, Inc., 124 Nev. 1483, 238 P.3d 828 (2008) (unpublished) (citing Kuehn  
22 v. Paroni, 20 Nev. 203, 19 P. 273, 274 (1888)).

23 **B. THE ORDER ISSUING THE PREJUDGMENT WRIT OF ATTACHMENT**  
24 **IS IMPROPER.**

25 Nevada Revised Statute 31.028 outlines the mandatory contents of any order directing the  
26 issuance of a prejudgment writ of attachment, with or without notice:

27 **NRS 31.028 Contents of order for attachment.** The court or judge issuing  
28 any order for attachment with or without notice *shall* set forth in the order:

1. The ground or grounds for attachment relied upon for the issuance of the  
order.

2. The facts or reasons why the court believes the ground or grounds exist.

3. The fact that the plaintiff has alleged a meritorious claim for relief.

4. The amount for which the attachment will issue.



5. The amount of security which must be given by the plaintiff before the writ will issue.

6. The names of all third persons upon whom writs of garnishment in aid of attachment may be served.

7. A description in reasonable detail of the money or property to be attached, and, if property, the value of the property based upon the evidence or affidavits presented to the court. The writ of attachment shall demand the amount for which attachment will issue, as specified in the order, and the court may order several writs to be issued at the same time to the sheriffs of different counties.

Nev. Rev. Stat. 31.028 (emphasis added). Nevada Revised Statute 31.220 provides that a writ of attachment that is improperly, improvidently or irregularly issued, “*must be discharged*[.]”

Here, the Order did not contain *any* of the required contents set forth in the statute. Instead, the Order – in its entirety (other than the caption, title, Judge’s signature/date and submission signature of counsel) – states:

COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter “Colvin”), YOUNG GEMMILL (hereinafter “Gemmill”), and PATHAMAWAN HANFORD (hereinafter “Hanford”), by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of Kuznetsky Law Group, P.C., and hereby submits their PROPOSED ORDER GRANTING PLAINTIFFS’ EX PARTE MOTION FOR ORDER DIRECTING THE ISSUANCE OF A PREJUDGMENT WRIT OF ATTACHMENT WITHOUT NOTICE. This Court, after reviewing the aforementioned matter and having good cause, hereby orders the following:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff’s Ex Parte Motion For An Order Directing The Issuance Of A Prejudgment Writ Of Attachment Without Notice is hereby GRANTED.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendants’ bank accounts and/or safety deposit boxes in the names of Brittanya Razavi, Marcello Razavi, Meow Gang Productions Studios, Inc., and/or DG Media & Entertainment Group, Inc. located at Chase Bank are hereby frozen and that no funds may be removed by anyone except by court order.

IT IS SO ORDERED.

DATED this 8<sup>th</sup> day of July, 2021.

(Exhibit F). The Order does not state: (1) the grounds for attachment relied upon; (2) the facts or reasons why the court believes the grounds exist; (3) the fact that Plaintiffs have alleged a meritorious claim for relief; (4) the *amount for which the attachment will issue*; (5) the amount of *security which must be given by the Plaintiffs before the writ will issue*; or (6) the names of

all third persons upon whom writs of garnishment in aid of attachment may be served. (See id.) Most notably, the Order did not contain an amount to be attached. (Id.) Since the Order did not contain an amount to be attached, coupled with the fact Plaintiffs apparently only served Chase Bank with a copy of the Motion for Issuance of a Prejudgment Writ of Attachment and the Order, Chase Bank apparently relied upon Plaintiffs' allegation of damages in the amount of \$2,584,728.51. (See Exh. E at p. 2:2-3). This is completely improper (aside from all of the other problems addressed herein) because the \$2.5 million amount represented Plaintiffs claim for compensatory *and* punitive damages. (Id.) The affidavits do not provide any analysis as to the calculation of damages, but in any event, the issuance of an Order which included punitive damages with absolutely no stated findings for the same is improper. Because the Order, which was drafted by Plaintiffs' counsel, did not comply with the provisions of Nevada Revised Statute 31.028, it should be vacated and if any writ of attachment issued, the same should be discharged pursuant to Nevada Revised Statute 31.220. See Williams v. Lochner, 2010 WL 2990732 \*3 (D. Nev. 2010) (not reported).

**C. PLAINTIFFS FAILED TO PROVIDE A WRITTEN UNDERTAKING REQUIRED UNDER NEVADA REVISED STATUTE 31.030.**

The Court need only look to its own docket to see that the issuance of a writ of attachment, or the attachment of Defendants' funds, was improper, as the docket is void of any filing of a written undertaking – which is required by the Nevada law. Nevada Revised Statute 31.030 requires:

1. *The court, in its order for attachment, shall require a written undertaking on the part of the plaintiff payable in lawful money of the United States in a sum not less than the amount claimed by the plaintiff or the value of the property to be attached, whichever is less, with two or more sureties* to the effect that if the plaintiff dismiss such action or if the defendant recover judgment the plaintiff will pay in lawful money of the United States all costs that may be awarded to the defendant, and all damages which the defendant may sustain by reason of the attachment including attorney's fees, not exceeding the sum specified in the undertaking. Each of the sureties shall annex to the undertaking an affidavit that the surety is a resident and householder or freeholder within the State, and worth double the sum specified in the undertaking over and above all the surety's debts and liabilities, exclusive of property exempt from execution. In the case of an attachment issued with notice to the defendant, or in any case upon showing by the defendant after notice to the plaintiff, the court may require an

1 additional bond. No bond may be required of the State or of an officer or agency  
2 thereof.

3 ...

4 Nev. Rev. Stat. 31.030(1) (emphasis added). The statute is crystal clear – the order for  
5 attachment “shall require a written undertaking on the part of the plaintiff...in a sum not less  
6 than the amount claimed by the plaintiff or the value of the property to be attached, whichever is  
7 less, with two or more sureties....” Id. The use of the term “shall” is a mandate and not within  
8 the discretion of the court. Goudge v. State, 128 Nev. 548, 287 P.3d 301 (2012) (“this court has  
9 explained that, when used in a statute, the word ‘shall’ imposes a duty upon a party to act and  
10 prohibits judicial discretion and, consequently, mandates that the result set forth by the statute.”  
11 (Citations omitted). “When a statute distinguished between ‘may’ and ‘shall,’ it is generally  
12 clear that ‘shall’ imposes a mandatory duty.” Kingdomware v. Technologies, Inc. v. U.S., \_\_\_ U.S.  
13 \_\_\_, 136 S.Ct. 1969, 195 L.Ed.2d 334 (2016) (citation omitted). The Court’s Order did not  
14 include *any* reference or directive that Plaintiffs secure a written undertaking, much less the  
15 amount of an undertaking or that the same must be with two or more sureties. Because the  
16 statute mandates this information be contained in the order, the Order is unlawful.

17 **D. ISSUANCE AND EXECUTION OF THE ORDER WAS IMPROPER.**

18 Moreover, Plaintiffs never filed with the Court any written undertaking required under  
19 Nev. Rev. Stat. 31.030(1). The statute requires that:

20 ...

21 2. ***Before*** issuing the writ of attachment the clerk ***shall*** require the filing by  
22 the plaintiff of the written undertaking required by the court pursuant to  
subsection 1.

23 First, upon information and belief, there was no writ of attachment actually issued. Instead, the  
24 Court issued an improper order for the issuance of a writ of prejudgment attachment. However,  
25 the lack of an actual writ of attachment did not stop the Plaintiffs from unlawfully freezing *all* of  
26 Defendants’ bank accounts. For reasons unknown to the Defendants, the Court either issued a  
27 writ of attachment (which was not provided to Chase Bank or the Defendants), or it issued the  
28 phantom writ of attachment without *first* receiving a filed written undertaking by Plaintiffs, as

1 required by the statute. As such, the Order is invalid and should be vacated or, if a writ of  
 2 attachment was issued, it should be discharged. Either way, the Defendants' bank accounts must  
 3 be unfrozen immediately.

4 Furthermore, the Ex Parte Motion did not include an affidavit for Gemmill or Hanford.  
 5 Nevada Revised Statute 31.020 states:

6 **NRS 31.020 Affidavit for attachment: Contents.**

7 1. All applications to the court for an order directing the clerk to issue a writ  
 8 of attachment without notice to the defendant shall be accompanied by the  
 9 affidavit of the plaintiff or any other person having personal knowledge of the  
 facts constituting one or more of the grounds for attachment, which affidavit or  
 affidavits shall:

10 (a) Set forth clearly the nature of the plaintiff's claim for relief and that the  
 11 same is valid.

12 (b) Set forth the amount which the affiant believes the plaintiff is entitled to  
 13 recover from the defendant, and if there is more than one plaintiff or more than  
 one defendant, the amount the affiant believes each plaintiff is entitled to recover  
 or the amount that the plaintiff is entitled to recover from each defendant.

14 (c) Describe in reasonable and clear detail all the facts which show the  
 15 existence of any one of the grounds for an attachment without notice to the  
 defendant.

16 (d) Describe in reasonable detail the money or property sought to be attached  
 17 and the location thereof if known.

18 (e) If the property sought to be attached is other than money, set forth to the  
 19 best knowledge and information of the affiant, the value of such property less any  
 prior liens or encumbrances.

20 (f) Name all third persons upon whom a writ of garnishment in aid of the writ  
 of attachment will be served.

21 (g) In an action upon a foreign judgment attach a copy of the judgment to the  
 22 affidavit for attachment as an exhibit.

23 (h) State whether, to the best information and belief of the affiant, the money  
 or property sought to be attached is exempt from execution.

24 2. All applications to the court for an order directing the clerk to issue a writ  
 25 of attachment with notice to the defendant shall be accompanied by an affidavit  
 26 setting forth the item required by subsection 1, except that such affidavit may  
 show the existence of any one of the grounds for attachment with notice.

27 Nev. Rev. Stat. 31.020.  
 28

1 First and foremost, neither Gemmill nor Hanford submitted an affidavit in support of  
2 their individual claims against the Defendants. For this reason alone, the Order is improper as it  
3 relates to Gemmill and Hanford. Neither Colvin nor Fattorosi's affidavits<sup>2</sup> provide any specific,  
4 individualized reference to the facts, claims and alleged damages specific to Gemmill or Hanford  
5 and, as such, these Plaintiffs failed to comply with the statute.

6 Second, the affidavit of Colvin does not comply with the statute. Subsection (1)(b) of the  
7 statute requires a statement which sets "forth the amount which the affiant believes the plaintiff  
8 is entitled to recover from the defendant, and *if there is more than one plaintiff or more than*  
9 *one defendant, the amount the affiant believes each plaintiff is entitled to recover or the*  
10 *amount that the plaintiff is entitled to recover from each defendant.*" Neither Colvin nor  
11 Fattorosi's affidavits contain a breakdown of damages attributed to each Defendant. (**Exhibit**  
12 **E**). Moreover, the affidavits do not include *any* breakdown for Gemmill or Hanford. Thus, these  
13 affidavits do not meet the statutory requirements under subsection (1)(b), rendering the Order  
14 invalid.

15 Third, neither affidavit submitted in support of the issuance of the prejudgment writ of  
16 attachment "[d]escribe in reasonable detail the money or property sought to be attached *and the*  
17 *location* thereof if known." Nev. Rev. Stat. 31.020(1)(d). Again, the affidavits do not provide a  
18 breakdown of individual amounts for each Plaintiff or against each Defendant. (**Exh. \_\_\_\_**).  
19 Moreover, the affidavits make absolutely no mention of the location of the money to be attached,  
20 which is an express requirement under subsection (1)(d). Therefore, the Order is invalid.

21 Next, the affidavits do not "[n]ame all third persons upon whom a writ of garnishment in  
22 aid of the writ of attachment will be served." Nev. Rev. Stat. 31.200(1)(f). The Plaintiffs  
23 improperly requested a writ of attachment, rather than a writ of garnishment, which would have  
24 been the proper vehicle for attachment of the bank accounts. Nevada Revised Statute 31.240  
25 states:

26  
27 <sup>2</sup> Fattorosi's Affidavit is not acknowledge by a Notary Public, nor does it contain the required statement  
28 under chapter 53 of Nevada Revised Statute to qualify as a declaration in lieu of affidavit.

**NRS 31.240 Writ of garnishment may issue at time of issuance of writ of attachment or later.** At the time of the order directing a writ of attachment to issue or at any time thereafter, the court may order that a writ of garnishment issue, and thereupon cause the money, credits, effects, debts, choses in action and other personal property of the defendant in the possession or under the control of any third person to be attached as security for any judgment the plaintiff may recover in the action against the defendant.

Nev. Rev. Stat. 31.240. The property attached by Plaintiffs was “money...of the defendant in the possession...” of a third party – Chase Bank. As such, a writ of garnishment, as opposed to a writ of attachment, was required. Irrespective of this fatal flaw, the Order was improper because the affidavits submitted in support of the issuance of the writ of attachment did not name all third persons whom a writ of garnishment in aid of the writ of attachment will be served, which would have been Chase Bank in this case. Again, this is a statutorily mandated requirement which Plaintiffs failed to meet.

Finally, the Order is invalid because the affidavits did not provide a statement as to any exception to exempt property. See Nev. Rev. Stat. 31.020(1)(h). Again, the statute *requires* that a plaintiff make a statement regarding exempt property and Plaintiffs did not breathe a word about this in the affidavit of Colvin or Fattorosi. Because Plaintiffs did not comply with the very clear statutory affidavit mandate, the Order is invalid and should be vacated and/or, if a writ of attachment was issued, the same should be discharged.

**E. THE FUNDS LEVIED ARE NECESSARY FOR DEFENDANTS TO SUPPORT AND MAINTAIN THEMSELVES, AS WELL AS THEIR FAMILY.**

Even if the Order was proper under the statute, the same should be vacated or discharged because Defendants need the funds to maintain their businesses and support their family. Nevada Revised Statute 31.200(1)(b) states that a writ of attachment can be discharged if “the property levied upon is...necessary and required by the defendant for the support and maintenance of the defendant and the members of the defendant’s family.” Nev. Rev. Stat. 31.200(1)(b). Here, the Plaintiffs unlawful Order froze *all* of the Defendants’ bank accounts with Chase Bank. As such, the Defendants are precluded from accessing any of their funds at Chase Bank, which in turn, prevents DG and Meow from conducting any business (e.g., paying

1 vendors, purchasing promotions, paying utilities, insurance, etc.) and prevents Marcello and  
2 Brittanya from accessing their personal funds at Chase Bank to maintain their daily living  
3 expenses and provide support for their family, to include their two young children. (**Exh. A** at ¶  
4 21; **Exh. B** at ¶ 18). Thus, even if Plaintiffs complied with the statute (which they did not), any  
5 writ of attachment should be discharged based upon its impact on Defendants.

6 **IV. CONCLUSION**

7 Given the foregoing, Defendants move this Court to immediately vacate the Order or, if a  
8 writ of attachment was issued, discharge the writ of attachment. Plaintiffs failed to comply with  
9 numerous requirements set forth in Nevada Revised Statute chapter 31 and these failures are  
10 fatal. Defendants request the Court immediately issue an order vacating the Order, or  
11 discharging any writ of attachment, and that the effective date of the order be upon issuance from  
12 the Court, such that the Defendants can operate their businesses and have funds available to care  
13 for their family. Defendants reserve the right to challenge the excessiveness of the attachment  
14 and also reserve the right to move this Court for an award of costs, attorneys fees and damages as  
15 a result of Plaintiffs' conduct.

16 Dated this 19th day of July, 2021.

17 MARQUIS AURBACH COFFING

18  
19 By /s/ Nick D. Crosby  
20 Nick D. Crosby, Esq.  
21 Nevada Bar No. 8996  
22 10001 Park Run Drive  
23 Las Vegas, Nevada 89145  
24 Attorney(s) for Defendants  
25  
26  
27  
28

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

# Exhibit A



**DECLARATION OF MARCELLO RAZAVI**

Marcello Razavi, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an officer, owner and employee of DG Media & Entertainment Grip, Inc. ("DG"), a Nevada corporation with its principal place of business is Clark County, Nevada.

3. I have two children with Brittany Razavi ("Brittanya"), ages 10 and 8, of which one has been diagnosed with Autism.

4. Brittany is an officer, owner and employee of Meow Gang Productions, Inc. ("Meow").

5. Meow and DG provide, *inter alia*, services related to social media influencing/influencers and other branding, promotion and marketing services for on-line digital formats.

6. Plaintiff Lauren Colvin ("Colvin") worked with DG and Meow as a licensee pursuant to a Licensing Agreement ("LA"). A true and correct copy of the LA is attached hereto as Exhibit A-1, but due to the confidential information contained therein, it is requested the LA be filed under seal. Specifically, DG does not want its compensation rates to be a matter of public information, as the same would harm its competitiveness in the industry, nor does DG wants its business model *vis a vis* licensees to be a matter of public record for fear of other competitors stealing its novel and confidential business strategies.

7. Colvin was paid pursuant to the terms of the LA for her work with DG and Meow.

8. On or about January 2021, after separating her relationship with Defendants, I discovered that the OnlyFans.com account(s) owned by DG, which showcased Colvin, were taken out of Defendants control and I have a reasonable belief Colvin was responsible for the conversation of DG's OnlyFans.com account.

MARQUIS AURBACH COFFING

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(702) 382-0711 FAX: (702) 382-5816

1           9. Plaintiff Youree Gemmill (“Gemmill”) worked with Defendants from  
2 approximately mid-October 2020 until January, 19 2021.

3           10. Gemmill did not have a Licensing Agreement like Colvin, but instead, upon  
4 information and belief, Gemmill and Brittanya discussed compensation and an agreement was  
5 reached with Gemmill, whereby Gemmill paid \$1,000 per month on a weekly basis initially.

6           11. Thereafter, Gemmill’s rate of compensation was to increase after four months, but  
7 Gemmill did not last that long.

8           12. Plaintiff Pathamawan Hanford (“Hanford”) had a similar arrangement as Colvin,  
9 whereby she was paid a percentage basis.

10          13. Hanford was offered a licensing agreement, similar in form to Colvin’s, but with a  
11 different compensation agreement, but the same was never executed.

12          14. Hanford executed an agreement with DG on July 14, 2020, which provided her  
13 written consent that DG had the right to take or use photographs of Hanford and released to DG  
14 all rights to the images.

15          15. Hanford worked with Defendants from July 2020 until January 2021.

16          16. In the early morning hours of July 15, 2021, I checked the Chase Bank accounts  
17 for DG and Meow via my mobile application and noticed that my accounts showed a negative  
18 balance.

19          17. Later that day, I visited a Chase Bank branch to inquire about the balances and  
20 was advised by a Chase Bank representative that the accounts were frozen as a result of a legal  
21 proceeding.

22          18. Chase Bank provided me with copies of a 21-page fax/scan, which was dated July  
23 13, 2021, entitled “Legal Papers Fax/Scan Cover Sheet”, which included a copy of the Ex Parte  
24 Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice,  
25 consisting of nine pages, and a copy of the Order with a certificate of service, as well as an  
26 Affidavit of Colvin and an unacknowledged Affidavit of attorney Michael W. Fattorosi  
27 (“Fattorosi”).  
28

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

1 19. Chase Bank did not provide me with any other court documents, including a  
2 Notice of Execution or Writ of Attachment, nor have any of the Defendants received the same.

3 20. On July 16, 2021 myself and Brittanya learned that our personal accounts at  
4 Chase Bank had been frozen as well when we visited Chase Bank again.

5 21. Without access to funds in the Chase Bank accounts, DG is unable to conduct  
6 business, to include paying vendors, business expenses and bills, depositing funds into the  
7 accounts or paying wages or other compensation. Further, with the freezing of assets in our  
8 personal accounts, I am unable to access funds in Chase Bank to maintain and support my  
9 family.

10 Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State  
11 of Nevada that the foregoing is true and correct.

12 Dated this \_\_\_ day of July, 2021.



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15 MARCELLO RAZAVI  
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# Exhibit B

**DECLARATION OF BRITTANY RAZAVI**

Brittanya Razavi, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an officer, owner and employee of Meow Gang Production Studio, Inc. ("Meow"), a Nevada corporation with its principal place of business is Clark County, Nevada.

3. I have two children with Marcello Razavi ("Marcello"), ages 10 and 8, of which one has been diagnosed with Autism.

4. Marcello is an officer, owner and employee of DG Media & Entertainment Group, Inc. ("DG").

5. Meow and DG provide, *inter alia*, services related to social media influencing/influencers and other branding, promotion and marketing services for on-line digital formats.

6. Plaintiff Lauren Colvin ("Colvin") worked with DG and Meow as a licensee pursuant to a Licensing Agreement ("LA"). A true and correct copy of the LA is attached hereto as Exhibit B-1, but due to the confidential information contained therein, it is requested the LA be filed under seal. Specifically, Meow does not want its compensation rates to be a matter of public information, as the same would harm its competitiveness in the industry, nor does Meow wants its business model *vis a vis* licensees to be a matter of public record for fear of other competitors stealing its novel and confidential business strategies.

7. Colvin was paid pursuant to the terms of the LA for her work with DG and Meow.

8. Plaintiff Youree Gemmill ("Gemmill") worked with Defendants from approximately mid-October 2020 until January, 19 2021.

MARQUIS AURBACH COFFING

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Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

1           9.       Gemmill did not have a licensing agreement like Colvin, but instead, Gemmill  
2 and I discussed compensation and an agreement was reached with Gemmill, whereby Gemmill  
3 paid \$1,000 per month on a weekly basis initially.

4           10.      Thereafter, Gemmill's rate of compensation was to increase after four months, but  
5 Gemmill did not last that long.

6           11.      The compensation paid to Gemmill was for the content she provided for her on-  
7 line social media, which was created, branded and promoted by Defendants.

8           12.      Plaintiff Pathamawan Hanford ("Hanford") had a similar arrangement as Colvin,  
9 whereby she was paid on a percentage basis.

10          13.      Hanford worked with Defendants from July 2020 until January 2021.

11          14.      In the early morning hours of July 15, 2021, Marcello checked the Chase Bank  
12 accounts for DG and Meow through his mobile application and noticed that the accounts showed  
13 a negative balance.

14          15.      On July 15, 2021, Chase Bank provided Marcello and I with copies of a 21-page  
15 fax/scan, which was dated July 13, 2021, entitled "Legal Papers Fax/Scan Cover Sheet", which  
16 included a copy of the Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ  
17 of Attachment Without Notice, consisting of nine pages, and a copy of the Order with a  
18 certificate of service, as well as an Affidavit of Colvin and an unacknowledged Affidavit of  
19 attorney Michael W. Fattorosi ("Fattorosi").

20          16.      Chase Bank did not provide me with any other court documents, including a  
21 Notice of Execution or Writ of Attachment, nor have any of the Defendants received the same.

22          17.      On July 16, 2021 myself and Marcello learned that our personal accounts at Chase  
23 Bank had been frozen as well.

24          18.      Without access to funds in the Chase Bank accounts, Meow is unable to conduct  
25 business, to include paying vendors, business expenses and bills, depositing funds into the  
26 accounts or paying wages or other compensation. Further, with the freezing of assets in our  
27 personal accounts, I am unable to access funds in Chase Bank to maintain and support my  
28 family.

1 Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State  
2 of Nevada that the foregoing is true and correct.

3 Dated this \_\_\_ day of July, 2021.

4  
5 

6 BRITTANYA RAZAVI  
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MARQUIS AURBACH COFFING

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Exhibit C  
*Filed Under Seal*



# Exhibit D

I hereby consent and agree that DG media & Entertainment Group, Inc (Photographer) has the right to take or use photographs of me (and/or my property) and to use these in any and all media worldwide including online, now or hereafter known, and for any purpose whatsoever.

I hereby release to the Photographer all rights to exhibit this work in print and electronic form publicly or privately and to market copies. I waive any rights, claims or interest I may have to control the use of my identity or likeness in the photographs and agree that any uses described herein may be made without compensation or additional consideration of me.

I represent that I am at least 18 years of age, have read and understand the foregoing statement, and am competent to execute this agreement.

Name: Pathamawan Hanford

Date: 07/14/2020

Address: 1700 N Lamb BLVD

Phone: 702-4169416

Las Vegas, NV 89115

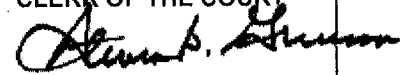
Signature: 

Parent/Guardian name & signature: \_\_\_\_\_  
(if under 18)

Witnessed by Photographer: M. [Signature] 07-14-2020

Witnessed by Photographer: \_\_\_\_\_

# Exhibit E

**EXMT (CIV)**

E. BRENT BRYSON, ESQ.

Nevada Bar No.: 004933

E. BRENT BRYSON, LTD.

3202 West Charleston Blvd.

Las Vegas, Nevada 89102

PH: (702) 364-1234

FAX: (702) 364-1442

Ebbesqltd@yahoo.com*Attorneys For Plaintiffs*

MICHAEL W. FATTOROSI, ESQ.

California State Bar No.: 193538

LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.

5850 Canoga Avenue, 4th Floor

Woodland Hills, California 91367

michael@fattlegal.com

PH: (818) 710-2727

*Pro Hac Vice Application Pending*

MICHAEL D. KUZNETSKY, ESQ.

California State Bar No.: 241045

KUZNETSKY LAW GROUP, P.C.

210 N. Pass Avenue, Suite 103

Burbank, California 91505

mike@kuzlaw.com

PH: (818) 753-2450

FAX: (818) 736-0999

*Pro Hac Vice Application Pending***DISTRICT COURT****CLARK COUNTY, NEVADA**LAUREN COLVIN, an individual;  
YOUREE GEMMILL, an individual;  
and PATHAMAWAN HANFORD,  
an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI;  
MARCELLO RAZAVI; MEOW  
GANG PRODUCTION STUDIOS,  
INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.;  
and DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XIX

**EX PARTE MOTION FOR ORDER  
DIRECTING THE ISSUANCE OF A  
PREJUDGMENT WRIT OF ATTACHMENT  
WITHOUT NOTICE**

///

///

COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter "Colvin"), YOUREE GEMMILL (hereinafter "Gemmill"), and PATHAMAWAN HANFORD (hereinafter "Hanford"), by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of Kuznetsky Law Group, P.C., and move this court, without notice and hearing, pursuant to NRS Chapter 31, for an order directing the issuance of a prejudgment writ of attachment without notice. This Motion is made and based upon the following Memorandum of Points and Authorities and the Affidavits of Plaintiff, Lauren Colvin and Michael W. Fattorosi, Esq.

DATED this 10<sup>th</sup> day of June, 2021.

E. BRENT BRYSON, LTD.

By: /s/ E. Brent Bryson

E. BRENT BRYSON, ESQ.

Nevada Bar No.: 4933

3202 West Charleston Blvd.

Las Vegas, NV 89102

*Attorney for Plaintiffs*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. FACTS**

This is an action brought by the Plaintiffs against the Defendants as a result of the Defendants' wrongfully taking monies that rightfully belonged to the Plaintiffs.

That from approximately July 2020 to January 2021, Defendant, Brittanya Razavi (hereinafter "Brittanya"), aided and abetted by Defendants Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., fraudulently embezzled all net income earned by Plaintiffs. In particular, Defendants embezzled \$473,445.10 from Colvin, \$38,086.02 from Gemmill, and \$52,862.09 from Hanford. When the fraud was discovered, Brittanya terminated all contact with the Plaintiffs and refused to return the embezzled funds. As

such, Defendants, and each of them, are liable for fraud, conversion, and unjust enrichment which may include a recovery of punitive damages under NRS 42.005(1) and attorneys' fees. Plaintiffs in this matter seeks compensatory and punitive damages totaling \$2,584,728.51. Additionally, Plaintiffs have recently learned the Defendants are in the process of searching for real estate to purchase worth approximately four million dollars (\$4,000,000) cash. Such cash payment it is asserted upon information and belief would include all of the money embezzled from Plaintiffs.

## II. STATEMENT OF LAW

NRS 31.017 authorizes this Court to order the Clerk to issue a writ of attachment, without notice and hearing. NRS 31.017 states in pertinent part:

The court may order the writ of attachment issued without notice to the defendant only in the following cases:

...

(3) In an action for the recovery of the value of personal property, where such personal property is owned by the plaintiff and has been taken or converted by the defendant without the consent of the plaintiff.

...

(5) Where the defendant is about to give, assign, hypothecate, pledge, dispose of or conceal the defendant's money or property or any part thereof and the defendant's money or property remaining in this State or that remaining unconcealed will be insufficient to satisfy the plaintiff's claim.

(6) In an action for the recovery of money or property, or the proceeds thereof, obtained from the plaintiff by the defendant through embezzlement, forgery, larceny or extortion.

In the instant case, a prejudgment Writ of Attachment is necessary to preserve Plaintiffs' rights because Defendants are actively seeking to spend all of their available cash and all funds embezzled from Plaintiffs, which would make Defendants judgment-proof and deprive Plaintiffs of a recovery. A prejudgment Writ of Attachment is expressly authorized by three separate and disjunctive subsections of NRS 31.017, in that (1) Plaintiffs seek to recover a specific amount of funds converted by Defendants (subsection 3); (2) Defendants are about to hypothecate/dispose of Plaintiffs' money to purchase real estate (subsection 5); and (3) Plaintiffs seek to recover funds that

1 were fraudulently embezzled from them (subsection 6).

2 In particular, Plaintiffs are concerned with the money within Defendants' bank accounts  
3 located at Chase Bank, as well as real property located in Las Vegas.

4 The attached Affidavit of Plaintiff Lauren Colvin meets the requirement of NRS 31.020(2).  
5

6 **CONCLUSION**

7 Based upon the foregoing, Plaintiffs respectfully request that the Court order a Writ of  
8 Attachment to issue and attach property located within the greater metropolitan area of Las Vegas,  
9 Nevada, bank accounts and/or safety deposit boxes, including, but not limited to, Chase Bank, in  
10 the names of Brittanya Razavi, Marcello Razavi, Meow Gang Production Studios, Inc., DG Media  
11 & Entertainment Group, Inc., and any entities which either Brittanya Razavi and/or Marcello  
12 Razavi directs or is a signatory upon.  
13

14 DATED this 10<sup>th</sup> day of June, 2021.

15 E. BRENT BRYSON, LTD.

16 By: /s/ E. Brent Bryson  
17 E. BRENT BRYSON, ESQ.  
18 Nevada Bar No.: 4933  
19 3202 West Charleston Blvd.  
20 Las Vegas, NV 89102  
21 *Attorneys for Plaintiffs*  
22  
23  
24  
25  
26  
27  
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**AFFIDAVIT OF PLAINTIFF LAUREN COLVIN**

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

Lauren Colvin, being first duly sworn, under penalty of perjury, deposes and says:

1. That Affiant is a Plaintiff in an action now pending in the Eighth Judicial District Court, Clark County, Nevada. That Affiant makes this Affidavit of facts personally known by her and to which she would be competent to testify in a court of law.

2. During the period of July 2020 to January 2021, Affiant worked with Brittanya Razavi for the purposes of creating, promoting and exploiting pornographic content of affiant on the OnlyFans website. Pursuant to our agreement, Razavi was to earn a commission of 50% of all net income earned from affiant's OnlyFans account. However, after Razavi set up the account, she refused to give me access or even show me the accountings of what was earned. Subsequently Razavi fraudulently embezzled all net income directly into her and/or the other Defendants bank accounts, including at Chase Bank.

3. During the period of July 2020 to January 2021, Brittanya Razavi, aided and abetted by Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., embezzled 100% of the net income earned by Affiant from OnlyFans by directly transferring it into Defendants' bank accounts, including at Chase Bank. Such total net income earned by Affiant was worth \$946,890.20.

4. When Affiant contacted Razavi about the embezzled amounts, Razavi terminated all contact with affiant.

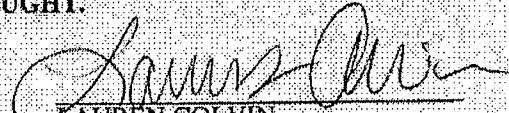
5. Said money of Affiant has been and continues to be wrongfully detained. Therefore, Affiant has a valid claim for fraud, conversion, and unjust enrichment.

6. On or about August 2020, Affiant learned that Brittanya and Marcelo Razavi are actively looking to purchase residential real estate in Las Vegas, Nevada, for cash, worth approximately four million dollars.



1           7. To the best of Affiant's knowledge, Brittany and Marcelo Razavi intend to use all  
2 the money embezzled from affiant and the other Plaintiffs in this case to purchase property for four  
3 million dollars. Upon information and belief, the ownership of such property will then be  
4 transferred into a trust.

5           **FURTHER, AFFIANT SAYETH NAUGHT.**

6  
7   
8 LAUREN COLVIN

9 Subscribed and sworn to before me  
10 this \_\_\_\_ day of \_\_\_\_\_, 2021.

11 \_\_\_\_\_  
12 Notary Public in and for said  
13 County and State  
14  
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**JURAT**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 2 day of June  
2021 by Lauren Colvin

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Sandra R. Herrera  
Signature (Seal)

**OPTIONAL INFORMATION****DESCRIPTION OF THE ATTACHED DOCUMENT**

Affidavit of  
(Title or description of attached document)

Plaintiff Lauren Colvin  
(Title or description of attached document continued)

Number of Pages \_\_\_\_\_ Document Date \_\_\_\_\_

Additional Information \_\_\_\_\_

**INSTRUCTIONS**

The wording of all Jurats completed in California after January 1, 2015 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one with does contain the proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and county information must be the state and county where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of the document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
  - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
  - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document with a staple.

**AFFIDAVIT OF MICHAEL W. FATTOROSI, ESQ.**

1  
2 STATE OF NEVADA )  
3 ) ss:  
4 COUNTY OF CLARK )

5 Michael W. Fattorosi, being first duly sworn, under penalty of perjury, deposes and says:

6 That he is an attorney licensed to practice law in the State of California and his application  
7 to appear in this action *pro hac vice* is following.

8 1. That your Affiant is an attorney with the law firm of Law Offices of Michael W.  
9 Fattorosi, P.C. and is an attorney for Plaintiffs, in the foregoing action; that your Affiant has  
10 personal knowledge of the facts stated herein and is competent to testify to the same and this  
11 Affidavit is submitted in support of the foregoing Motion.

12 2. To the best of Affiant's knowledge, during the period of July 2020 to January 2021,  
13 Brittany Razavi, aided and abetted by Marcello Razavi, Meow Gang Production Studios, Inc., and  
14 DG Media & Entertainment Group, Inc., embezzled 100% of the net income earned by Plaintiffs  
15 Lauren Colvin, Youree Gemmill, and Pathamawan Hanford by directly transferring monies into  
16 Defendants' bank accounts, including at Chase Bank. Such total net income embezzled was worth  
17 \$946,890.20.  
18

19 3. Brittany and Marcelo Razavi have purchased and own at least four residential  
20 properties in Las Vegas Nevada. To the best of Affiant's knowledge, each of these properties were  
21 purchased in cash and initially transferred into a trust to shield them from their personal liability.  
22 Such properties include the following:  
23

24 a. 8956 Aurora Bay Court, Las Vegas, Nevada; currently owned by Razavi  
25 Brittany McCall Revocable Living Trust dated April 1, 2019, for which Brittany Razavi is the  
26 trustee;  
27

28 ///

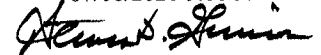


c. 9522 Michelle Falls Avenue, Las Vegas, Nevada; previously owned by The Brittanya McCall Razavi Revocable Spenthrift Trust dated April 1, 2019, for which Brittany Razavi was the trustee; and currently owned by 3725 Seneca Highlands LLC, a Nevada limited liability company, for which Brittanya Razavi is the managing member; and

**FURTHER, AFFIANT SAYETH NAUGHT.**

~~MICHAEL W. FATTOROSI~~

# Exhibit F



CLERK OF THE COURT

**OGM (CIV)**

E. BRENT BRYSON, ESQ.

Nevada Bar No.: 004933

E. BRENT BRYSON, LTD.

3202 West Charleston Blvd.

Las Vegas, Nevada 89102

PH: (702) 364-1234

FAX: (702) 364-1442

Ebbesqltd@yahoo.com*Attorneys For Plaintiffs*

MICHAEL W. FATTOROSI, ESQ.

California State Bar No.: 193538

LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.

5850 Canoga Avenue, 4th Floor

Woodland Hills, California 91367

michael@fattlegal.com

PH: (818) 710-2727

*Pro Hac Vice Application Pending*

MICHAEL D. KUZNETSKY, ESQ.

California State Bar No.: 241045

KUZNETSKY LAW GROUP, P.C.

210 N. Pass Avenue, Suite 103

Burbank, California 91505

mike@kuzlaw.com

PH: (818) 753-2450

FAX: (818) 736-0999

*Pro Hac Vice Application Pending***DISTRICT COURT****CLARK COUNTY, NEVADA**LAUREN COLVIN, an individual;  
YOUREE GEMMILL, an individual;  
and PATHAMAWAN HANFORD,  
an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI;  
MARCELLO RAZAVI; MEOW  
GANG PRODUCTION STUDIOS,  
INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.;  
and DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XIX

**PLAINTIFFS' PROPOSED ORDER GRANTING  
PLAINTIFFS' EX PARTE MOTION FOR  
ORDER DIRECTING THE ISSUANCE OF A  
PREJUDGMENT WRIT OF ATTACHMENT  
WITHOUT NOTICE**

///

///

1 COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter "Colvin"), YOUREE  
2 GEMMILL (hereinafter "Gemmill"), and PATHAMAWAN HANFORD (hereinafter "Hanford"),  
3 by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd.,  
4 Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of  
5 Kuznetsky Law Group, P.C., and hereby submits their PROPOSED ORDER GRANTING  
6 PLAINTIFFS' EX PARTE MOTION FOR ORDER DIRECTING THE ISSUANCE OF A  
7 PREJUDGMENT WRIT OF ATTACHMENT WITHOUT NOTICE. This Court, after reviewing  
8 the aforementioned matter and having good cause, hereby orders the following:  
9

10 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiffs' Ex Parte  
11 Motion For An Order Directing The Issuance Of A Prejudgment Writ Of Attachment Without  
12 Notice is hereby GRANTED.  
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1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendants' bank  
2 accounts and/or safety deposit boxes in the names of Brittanya Razavi, Marcello Razavi, Meow  
3 Gang Production Studios, Inc., and/or DG Media & Entertainment Group, Inc. located at Chase  
4 Bank are hereby frozen and that no funds may be removed by anyone except by court order.

5 IT IS SO ORDERED.

6 DATED this 8<sup>th</sup> day of July, 2021.

7  
8  
9 Dated this 8th day of July, 2021

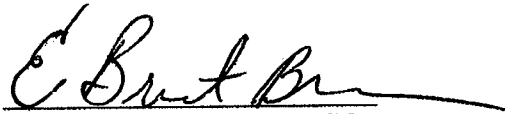
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11 THE HONORABLE JUDGE CRYSTAL ELLER

12 7AA AFA 53AA E7A5  
Crystal Eller  
District Court Judge

13 Respectfully Submitted by:

14 E. BRENT BRYSON, LTD.

15 

16 E. BRENT BRYSON, ESQ.

17 Nevada Bar No.: 004933  
3202 W. Charleston Blvd.  
Las Vegas, NV 89102  
(702) 364-1234 Telephone  
(702) 364-1442 Facsimile  
18 Ebbesqltd@yahoo.com  
19 Attorneys for Plaintiffs  
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1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

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5  
6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 19

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Brittanya Razavi, Defendant(s)

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 7/8/2021

Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
E. Brent Bryson	EBBESQLTD@YAHOO.COM
E. BRYSON	ebbesqltd@yahoo.com
Michael Fattorosi	Michael@fattlegal.com
Michael Fattorosi	Michael@fattlegal.com
E. Bryson	EBBESQLTD@YAHOO.COM
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
Michael Kuznetsky	Mike@kuzlaw.com
Michael Kuznetsky	Mike@kuzlaw.com

E. Bryson

ebbesqltd@yahoo.com

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1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 19

8  
9 Brittanya Razavi, Defendant(s)

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District  
12 Court. The foregoing Order Shortening Time was served via the court's electronic eFile  
13 system to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 7/20/2021

15 Suzanne Boggs	sboggs@maclaw.com
16 Nicholas Crosby	ncrosby@maclaw.com
17 Michael Fattorosi	Michael@fattlegal.com
18 Michael Kuznetsky	Mike@kuzlaw.com
19 E. Brent Bryson	EBBESQLTD@YAHOO.COM
20 E. BRYSON	ebbesqltd@yahoo.com
21 Michael Fattorosi	Michael@fattlegal.com
22 Michael Fattorosi	Michael@fattlegal.com
23 E. Bryson	EBBESQLTD@YAHOO.COM
24 Michael Fattorosi	Michael@fattlegal.com
25 Michael Kuznetsky	Mike@kuzlaw.com

26  
27  
28

1 Michael Kuznetsky

Mike@kuzlaw.com

2 Michael Kuznetsky

Mike@kuzlaw.com

3 E. Bryson

ebbesqltd@yahoo.com

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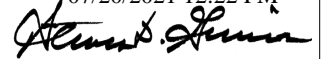
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# EXHIBIT H



CLERK OF THE COURT

**Marquis Aurbach Coffing**  
 Nick D. Crosby, Esq.  
 Nevada Bar No. 8996  
 10001 Park Run Drive  
 Las Vegas, Nevada 89145  
 Telephone: (702) 382-0711  
 Facsimile: (702) 382-5816  
 ncrosby@maclaw.com  
*Attorneys for Defendants*

**DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
 GEMMILL, an individual; and  
 PATHAMAWAN HANFORD, an individual,

Case No.: A-21-836019-C  
 Dept. No.: XIX

Plaintiffs,

vs.

HEARING SET  
 Date: Aug. 3, 2021  
 Time: 9:30 AM  
 BMT

BRITTANYA RAZAVI; MARCELLO  
 RAZAVI; MEOW GANG PRODUCTION  
 STUDIOS, INC.; DG MEDIA &  
 ENTERTAINMENT GROUP, INC.; and DOES  
 1-10 inclusive,

Defendants.

**DEFENDANTS' MOTION TO FILE UNDER SEAL EXHIBIT C ON ORDER**  
**SHORTENING TIME**

Defendants, Brittanya Razavi ("Brittanya"), Marcello Razavi ("Marcello"), Meow Gang  
 Production Studios, Inc. ("Meow"), and DG Media & Entertainment Group, Inc. ("DG")  
 (collectively "Defendants"), by and through their attorneys of record, Nick D. Crosby, Esq., with  
 the law firm of Marquis Aurbach Coffing, hereby files this Motion to File Under Seal Exhibit C  
 to the Motion to Vacate Order or, Alternatively, Discharge Prejudgment Writ of Attachment, on  
 an Order Shortening Time in the above-referenced matter.

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This Motion is made and based upon the attached Memorandum of Points and Authorities, all pleadings and papers on file herein, and any oral argument allowed at the time of the hearing.

Dated this 19th day of July, 2021.

MARQUIS AURBACH COFFING

By: /s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for Defendants*

**ORDER SHORTENING TIME**

Upon the Declaration of Nick D. Crosby, Esq., and good cause appearing therefore,

IT IS HEREBY ORDERED, ADJUDGED, and DECREED that the time for hearing of the above-entitled matter will be shortened and will be heard on the 3rd day of August, 2021, at the hour of 9:30 AM.m. in Department XIX of the Eighth Judicial District Court, located at the Regional Justice Center, 200 Lewis Avenue, Las Vegas, Nevada 89155. \*\* Opposition & Reply deadlines are the same as the Motion to Vacate, filed contemporaneously with this motion.

Dated this 20th day of July, 2021

  
DISTRICT COURT JUDGE

Submitted by:

MARQUIS AURBACH COFFING

**928 163 5240 85EB**  
**Crystal Eller**  
**District Court Judge**

By: /s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
*Attorneys for Defendants*

**DECLARATION OF NICK D. CROSBY, ESQ.**  
**IN SUPPORT OF ORDER SHORTENING TIME**

Nick D. Crosby, Esq. declares as follows:

1. I am a shareholder with the law firm of Marquis Aurbach Coffing, counsel for the Defendants in the above-stated action.

2. I am duly licensed to practice law in the State of Nevada and have personal knowledge of and I am competent to testify concerning the facts herein.

3. Contemporaneous with the filing of this Motion to Seal, Defendants filed a Motion to Vacate Order or, in the Alternative, Discharge Prejudgment Writ of Attachment on an Order Shortening Time.

4. Plaintiffs in this matter unlawfully attached all of the Defendants' Chase Bank accounts pursuant to an unlawful order.

5. Exhibit C to the Motion to Vacate/Discharge is a Licensing Agreement with Plaintiff Colvin.

6. Defendants considering the compensation terms contained in the Licensing Agreement, as well as the Agreement itself, confidential.

7. The Defendants referenced the Licensing Agreement in their Motion to Vacate/Discharge, as Plaintiffs made absolutely no mention of the Licensing Agreement in their complaint or Motion for Prejudgment Writ of Attachment.

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8. The instant Motion is not brought for purposes of delay or harassment and is brought in good faith to provide evidence to the Court in considering the Motion to Vacate/Discharge while protecting the intellectual property and confidential information of Defendants.

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 19<sup>th</sup> day of July, 2021.

/s/ Nick D. Crosby  
Nick D. Crosby, Esq.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. INTRODUCTION**

Plaintiffs unlawfully attached all of Defendants Chase Bank accounts via an improper and statutorily unlawful order directing the issuance of a prejudgment writ of attachment. Contemporaneously with this Motion, Defendants filed a Motion to Vacate Order, or in the Alternative, Discharge Prejudgment Writ of Attachment. In the Motion to Vacate/Discharge, Defendants reference a Licensing Agreement with Plaintiff Colvin, which Defendants maintain is confidential and intellectual property. As such, in order to keep the Licensing Agreement confidential, Defendants respectfully request the Court seal Exhibit C to the Motion to Vacate/Discharge.

### **II. STATEMENT OF RELEVANT FACTS**

The lawsuit is a dispute between three licensees (the Plaintiffs) and Defendant DG and Meow. Plaintiffs filed a Complaint against the Defendants, then moved for an ex parte writ of attachment without notice. Despite the fact Plaintiffs did not comply with chapter 31 of Nevada Revised Statute in obtaining a writ of attachment, the Court issued an order directing the issuance of a writ of attachment. Plaintiffs did not file a notice of written undertaking with the Court, which is required by Nevada Revised Statute 31.030. Despite their non-compliance with

the statute, Plaintiffs then served the order directing the issuance of a writ of attachment upon Chase Bank, subsequently freezing all of Defendants' bank accounts with Chase Bank.

The exhibit sought to be filed under seal, attached hereto as Exhibit A and submitted *in camera*, is designated as Exhibit C to Defendants' Motion to Vacate Order or, Alternatively, Discharge Writ of Prejudgment Writ of Attachment on an Order Shortening Time. The Exhibit is a Licensing Agreement between DG/Meow and Plaintiff Colvin. As stated in the Declarations of Marcello and Brittany, the Defendants consider the Licensing Agreement to be confidential – particularly the compensation. (See **Exhibit A** and **B**, respectively. However, the Defendants consider the Licensing Agreement to be confidential in its entirety, as it is a key part of their business model.

### **III. LEGAL ARGUMENT**

#### **A. STANDARDS FOR SEALING OR REDACTING RECORDS.**

Pursuant to SRCR Rule 3(1), “[a]ny person may request that the court seal or redact court records for a case that is subject to these rules by filing a written motion....” SRCR Rule 3(1). SRCR Rule 3 sets forth the grounds upon which the Court may seal or redact documents or exhibits filed with the Court. SRCR Rule 3(4) provides, in pertinent part:

4. Grounds to seal or redact; written findings required. The court may order the court files and records, or any part thereof, in a civil action to be sealed or redacted, provided the court makes and enters written findings that the specific sealing or redaction is justified by identified compelling privacy or safety interests that outweigh the public interest in access to the court record. The parties' agreement alone does not constitute a sufficient basis for the court to seal or redact court records. The public interest in privacy or safety interests that outweigh the public interest in open court records include findings that:

...

(g) The sealing or redaction is necessary to protect intellectual proprietary or property interests such as trade secrets as defined in [NRS 600A.030\(5\)](#); or

(h) The sealing or redaction is justified or required by another identified compelling circumstance.

SRCR Rule 3(4)(g)-(h).

**B. FILING THE REFERENCED EXHIBIT C UNDER SEAL IS WARRANTED.**

The Licensing Agreement is the intellectual property of DG and Meow and its confidentiality is necessary to protect the interests of DG and Meow. DG and Meow consider the Licensing Agreement to be confidential and public disclosure of the same is not necessary and will only provide an opportunity for DG and Meow's competitors to get access to its business model. As such, the Licensing Agreement should be sealed.

Defendants respectfully request Exhibit C to the Motion to Vacate Order or, Alternatively, Discharge Prejudgment Writ of Attachment be sealed.

MARQUIS AURBACH COFFING

# Exhibit A

**DECLARATION OF MARCELLO RAZAVI**

Marcello Razavi, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an officer, owner and employee of DG Media & Entertainment Grip, Inc. ("DG"), a Nevada corporation with its principal place of business is Clark County, Nevada.

3. I have two children with Brittanya Razavi ("Brittanya"), ages 10 and 8, of which one has been diagnosed with Autism.

4. Brittanya is an officer, owner and employee of Meow Gang Productions, Inc. ("Meow").

5. Meow and DG provide, *inter alia*, services related to social media influencing/influencers and other branding, promotion and marketing services for on-line digital formats.

6. Plaintiff Lauren Colvin ("Colvin") worked with DG and Meow as a licensee pursuant to a Licensing Agreement ("LA"). A true and correct copy of the LA is attached hereto as Exhibit A-1, but due to the confidential information contained therein, it is requested the LA be filed under seal. Specifically, DG does not want its compensation rates to be a matter of public information, as the same would harm its competitiveness in the industry, nor does DG wants its business model *vis a vis* licensees to be a matter of public record for fear of other competitors stealing its novel and confidential business strategies.

7. Colvin was paid pursuant to the terms of the LA for her work with DG and Meow.

8. On or about January 2021, after separating her relationship with Defendants, I discovered that the OnlyFans.com account(s) owned by DG, which showcased Colvin, were taken out of Defendants control and I have a reasonable belief Colvin was responsible for the conversation of DG's OnlyFans.com account.

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

1           9.     Plaintiff Youree Gemmill ("Gemmill") worked with Defendants from  
2 approximately mid-October 2020 until January, 19 2021.

3           10.    Gemmill did not have a Licensing Agreement like Colvin, but instead, upon  
4 information and belief, Gemmill and Brittanya discussed compensation and an agreement was  
5 reached with Gemmill, whereby Gemmill paid \$1,000 per month on a weekly basis initially.

6           11.    Thereafter, Gemmill's rate of compensation was to increase after four months, but  
7 Gemmill did not last that long.

8           12.    Plaintiff Pathamawan Hanford ("Hanford") had a similar arrangement as Colvin,  
9 whereby she was paid a percentage basis.

10          13.    Hanford was offered a licensing agreement, similar in form to Colvin's, but with a  
11 different compensation agreement, but the same was never executed.

12          14.    Hanford executed an agreement with DG on July 14, 2020, which provided her  
13 written consent that DG had the right to take or use photographs of Hanford and released to DG  
14 all rights to the images.

15          15.    Hanford worked with Defendants from July 2020 until January 2021.

16          16.    In the early morning hours of July 15, 2021, I checked the Chase Bank accounts  
17 for DG and Meow via my mobile application and noticed that my accounts showed a negative  
18 balance.

19          17.    Later that day, I visited a Chase Bank branch to inquire about the balances and  
20 was advised by a Chase Bank representative that the accounts were frozen as a result of a legal  
21 proceeding.

22          18.    Chase Bank provided me with copies of a 21-page fax/scan, which was dated July  
23 13, 2021, entitled "Legal Papers Fax/Scan Cover Sheet", which included a copy of the Ex Parte  
24 Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice,  
25 consisting of nine pages, and a copy of the Order with a certificate of service, as well as an  
26 Affidavit of Colvin and an unacknowledged Affidavit of attorney Michael W. Fattorosi  
27 ("Fattorosi").  
28

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX (702) 382-5816

1 19. Chase Bank did not provide me with any other court documents, including a  
2 Notice of Execution or Writ of Attachment, nor have any of the Defendants received the same.

3 20. On July 16, 2021 myself and Brittany learned that our personal accounts at  
4 Chase Bank had been frozen as well when we visited Chase Bank again.

5 21. Without access to funds in the Chase Bank accounts, DG is unable to conduct  
6 business, to include paying vendors, business expenses and bills, depositing funds into the  
7 accounts or paying wages or other compensation. Further, with the freezing of assets in our  
8 personal accounts, I am unable to access funds in Chase Bank to maintain and support my  
9 family.

10 Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State  
11 of Nevada that the foregoing is true and correct.

12 Dated this \_\_\_ day of July, 2021.



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15 MARCELLO RAZAVI  
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# Exhibit B



**DECLARATION OF BRITTANYA RAZAVI**

Brittanya Razavi, declares as follows:

1. I am over the age of 18 years and have personal knowledge of the facts stated herein, except for those stated upon information and belief, and as to those, I believe them to be true. I am competent to testify as to the facts stated herein in a court of law and will so testify if called upon.

2. I am an officer, owner and employee of Meow Gang Production Studio, Inc. ("Meow"), a Nevada corporation with its principal place of business is Clark County, Nevada.

3. I have two children with Marcello Razavi ("Marcello"), ages 10 and 8, of which one has been diagnosed with Autism.

4. Marcello is an officer, owner and employee of DG Media & Entertainment Group, Inc. ("DG").

5. Meow and DG provide, *inter alia*, services related to social media influencing/influencers and other branding, promotion and marketing services for on-line digital formats.

6. Plaintiff Lauren Colvin ("Colvin") worked with DG and Meow as a licensee pursuant to a Licensing Agreement ("LA"). A true and correct copy of the LA is attached hereto as Exhibit B-1, but due to the confidential information contained therein, it is requested the LA be filed under seal. Specifically, Meow does not want its compensation rates to be a matter of public information, as the same would harm its competitiveness in the industry, nor does Meow wants its business model *vis a vis* licensees to be a matter of public record for fear of other competitors stealing its novel and confidential business strategies.

7. Colvin was paid pursuant to the terms of the LA for her work with DG and Meow.

8. Plaintiff Youree Gemmill ("Gemmill") worked with Defendants from approximately mid-October 2020 until January, 19 2021.

1           9.       Gemmill did not have a licensing agreement like Colvin, but instead, Gemmill  
2       and I discussed compensation and an agreement was reached with Gemmill, whereby Gemmill  
3       paid \$1,000 per month on a weekly basis initially.

4           10.       Thereafter, Gemmill's rate of compensation was to increase after four months, but  
5       Gemmill did not last that long.

6           11.       The compensation paid to Gemmill was for the content she provided for her on-  
7       line social media, which was created, branded and promoted by Defendants.

8           12.       Plaintiff Pathamawan Hanford ("Hanford") had a similar arrangement as Colvin,  
9       whereby she was paid on a percentage basis.

10          13.       Hanford worked with Defendants from July 2020 until January 2021.

11          14.       In the early morning hours of July 15, 2021, Marcello checked the Chase Bank  
12       accounts for DG and Meow through his mobile application and noticed that the accounts showed  
13       a negative balance.

14          15.       On July 15, 2021, Chase Bank provided Marcello and I with copies of a 21-page  
15       fax/scan, which was dated July 13, 2021, entitled "Legal Papers Fax/Scan Cover Sheet", which  
16       included a copy of the Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ  
17       of Attachment Without Notice, consisting of nine pages, and a copy of the Order with a  
18       certificate of service, as well as an Affidavit of Colvin and an unacknowledged Affidavit of  
19       attorney Michael W. Fattorosi ("Fattorosi").

20          16.       Chase Bank did not provide me with any other court documents, including a  
21       Notice of Execution or Writ of Attachment, nor have any of the Defendants received the same.

22          17.       On July 16, 2021 myself and Marcello learned that our personal accounts at Chase  
23       Bank had been frozen as well.

24          18.       Without access to funds in the Chase Bank accounts, Meow is unable to conduct  
25       business, to include paying vendors, business expenses and bills, depositing funds into the  
26       accounts or paying wages or other compensation. Further, with the freezing of assets in our  
27       personal accounts, I am unable to access funds in Chase Bank to maintain and support my  
28       family.

1 Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State  
2 of Nevada that the foregoing is true and correct.

3 Dated this \_\_ day of July, 2021.

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6 BRITTANY RAZAVI  
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MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

Exhibit C  
*Submitted In Camera*

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4  
5  
6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 19

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Brittanya Razavi, Defendant(s)

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order Shortening Time was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 7/20/2021

Suzanne Boggs	sboggs@maclaw.com
Nicholas Crosby	ncrosby@maclaw.com
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
E. Brent Bryson	EBBESQLTD@YAHOO.COM
E. BRYSON	ebbesqltd@yahoo.com
Michael Fattorosi	Michael@fattlegal.com
Michael Fattorosi	Michael@fattlegal.com
E. Bryson	EBBESQLTD@YAHOO.COM
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com

1 Michael Kuznetsky

Mike@kuzlaw.com

2 Michael Kuznetsky

Mike@kuzlaw.com

3 E. Bryson

ebbesqltd@yahoo.com

4

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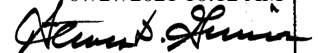
25

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# EXHIBIT I

  
 CLERK OF THE COURT
**SAO**

E. BRENT BRYSON, ESQ.

Nevada Bar No.: 004933

E. BRENT BRYSON, LTD.

3202 West Charleston Blvd.

Las Vegas, Nevada 89102

PH: (702) 364-1234

FAX: (702) 364-1442

Ebbesqltd@yahoo.com*Attorney For Plaintiffs*

MICHAEL W. FATTOROSI, ESQ.

California State Bar No.: 193538

LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.

5850 Canoga Avenue, 4th Floor

Woodland Hills, California 91367

michael@fattlegal.com

PH: (818) 710-2727

*Pro Hac Vice Application Pending*

MICHAEL D. KUZNETSKY, ESQ.

California State Bar No.: 241045

KUZNETSKY LAW GROUP, P.C.

210 N. Pass Avenue, Suite 103

Burbank, California 91505

mike@kuzlaw.com

PH: (818) 753-2450

FAX: (818) 736-0999

*Pro Hac Vice Application Pending***DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
 GEMMILL, an individual; and  
 PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
 RAZAVI; MEOW GANG PRODUCTION  
 STUDIOS, INC.; DG MEDIA &  
 ENTERTAINMENT GROUP, INC.; and  
 DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XIX

**STIPULATION AND ORDER TO  
 VACATE COURT'S JULY 8, 2021  
 ORDER GRANTING PLAINTIFFS' EX  
 PARTE MOTION FOR ORDER  
 DIRECTING THE ISSUANCE OF A  
 PREJUDGMENT WRIT OF  
 ATTACHMENT WITHOUT NOTICE**



COMES NOW, Plaintiffs, LAUREN COLVIN, YOUNG GEMMILL and PATHAMAWAN HANFORD (collectively "Plaintiffs"), by and through their attorney, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., and Defendants Brittanya Razavi, Marcello Razavi, Meow Gang Production Studios, Inc. and DG Media & Entertainment Group, Inc. (collectively "Defendants"), by and through their counsel of record, Nick D. Crosby, Esq. of Marquis Aurbach Coffing, and hereby stipulate and agree that the hearing on August 3, 2021 at 9:30 a.m. regarding Defendants' Motion to Vacate Order or, Alternatively, Discharge Prejudgment Writ of Attachment on Order Shortening Time, be vacated.

It is further stipulated that the Court Order of July 8, 2021 granting Plaintiffs' Ex Parte Motion For Order Directing The Issuance Of A Prejudgment Writ of Attachment Without Notice is hereby immediately vacated and discharged.

It is further stipulated that Defendants do not waive any right, action or claim they may have as a result of the attachment, freezing or hold on their accounts caused by the July 8, 2021 Order.

DATED this 26<sup>th</sup> day of July, 2021.

DATED this 26<sup>th</sup> day of July, 2021.

s/ E. Brent Bryson  
E. Brent Bryson, Esq.  
Nevada Bar No.: 04933  
Law Offices of E. Brent Bryson, Ltd.  
3202 West Charleston Blvd.  
Las Vegas, NV 89102  
(702) 364-1234 Telephone  
Ebbesqltd@yahoo.com  
*Attorneys for Plaintiffs*

s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No.: 08996  
Marquis Aurbach Coffing  
10001 Park Run Drive  
Las Vegas, NV 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
*Attorneys for Defendants B. Razavi, M. Razavi, Meow Gang Production Studios, Inc. and DG Media & Entertainment Group, Inc.*

Case No.: A-21-836019-C  
Colvin, et al v. Razavi, et al

**ORDER**

Based on the foregoing stipulation, it is hereby ORDERED, ADJUDGED AND DECREED that the August 3, 20212, 9:30 a.m. hearing for Defendant's Motion to Vacate Order Or, Alternatively, Discharge Prejudgment Writ Of Attachment On Oder Shortening Time is hereby vacated.

IT IS FURTHER ORDERED that this Court's July 8, 2021 Order granting Plaintiffs' Ex Parte Motion For Order Directing The Issuance Of A Prejudgment Writ of Attachment Without Notice is hereby immediately vacated and dissolved.

IT IS FURTHER ORDERED that any funds held, frozen, restricted or otherwise attached in any of the Defendants' accounts with Chase Bank shall be immediately released to Defendants and any restrictions implemented as a result of the July 8, 2021 Order shall immediately cease.

**IT IS SO ORDERED.**

Dated this 27th day of July, 2021



THE HONORABLE DISTRICT COURT JUDGE

8D9 3B9 948A D6C5  
Crystal Eller  
District Court Judge

Dated: \_\_\_\_\_

Respectfully Submitted By:

/s/ E. Brent Bryson

E. Brent Bryson, Esq.  
E. Brent Bryson, Ltd.  
Nevada Bar No.: 004933  
3202 West Charleston Boulevard  
Las Vegas, Nevada 89102  
*Attorneys for Plaintiffs*

Re: [External] Re: [External] Fw: [External] A-21-836019-C: Colvin, et al v. Razavi, et al: Court Order [IWOV-iManage.FID1149897]

---

From: Nick Crosby (ncrosby@maclaw.com)

To: ebbesqltd@yahoo.com

Cc: sboggs@maclaw.com

Date: Monday, July 26, 2021, 11:48 AM PDT

---

Permission to e-sign and submit to the court. Thank You,

Nick D. Crosby, Esq.  
Marquis Aurbach Coffing  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Office: 702-942-2158

Sent from my iPhone, so please excuse any errors.

On Jul 26, 2021, at 11:34 AM, Eric Bryson <ebbesqltd@yahoo.com> wrote:

Dear Mr. Crosby,

Attached please find Mr. Bryson's stipulation to include your changes.

Please advise if further changes are required or if we have your authorization to affix your electronic signature and submit to DC Inbox Department 19.

Thank you,

Ron Hirsch  
Legal Assistant to:

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E. BRENT BRYSON, LTD.  
3202 West Charleston Blvd.  
Las Vegas, Nevada 89102  
P: 702-364-1234  
F: 702-364-1442  
[ebbesqltd@yahoo.com](mailto:ebbesqltd@yahoo.com)  
<http://www.ebrentbrysonltd.com>

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On Monday, July 26, 2021, 08:51:26 AM PDT, Nick Crosby <ncrosby@maclaw.com> wrote:

Good Morning Brent – Attached are my redlines. Please let me know if you have any questions or changes and let's get this wrapped up today.

Thanks,

Nick

---

**From:** Eric Bryson <ebbesqltd@yahoo.com>

**Sent:** Friday, July 23, 2021 3:59 PM

**To:** Nick Crosby <NCrosby@maclaw.com>

**Subject:** [External] Fw: [External] A-21-836019-C: Colvin, et al v. Razavi, et al: Court Order [IWOV-iManage.FID1149897]

Dear Mr. Crosby,

Please see attached for Mr. Bryson's proposed stipulation and order in this case.

Respectfully,

Ron Hirsch

Legal Assistant to:

E. BRENT BRYSON, ESQ.

E. BRENT BRYSON, LTD.

3202 West Charleston Blvd.

Las Vegas, Nevada 89102

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[ebbesqltd@yahoo.com](mailto:ebbesqltd@yahoo.com)

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1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

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5  
6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 19

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Brittanya Razavi, Defendant(s)

**AUTOMATED CERTIFICATE OF SERVICE**

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Service Date: 7/27/2021

Suzanne Boggs	sboggs@maclaw.com
Nicholas Crosby	ncrosby@maclaw.com
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
E. Brent Bryson	EBBESQLTD@YAHOO.COM
E. BRYSON	ebbesqltd@yahoo.com
Michael Fattorosi	Michael@fattlegal.com
Michael Fattorosi	Michael@fattlegal.com
E. Bryson	EBBESQLTD@YAHOO.COM
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com

1 Michael Kuznetsky

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2 Michael Kuznetsky

Mike@kuzlaw.com

3 E. Bryson

4 ebbesqltd@yahoo.com

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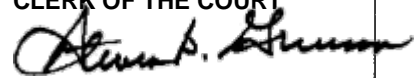
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# EXHIBIT J



Electronically Filed  
7/27/2021 10:30 AM  
Steven D. Grierson  
CLERK OF THE COURT



**Marquis Aurbach Coffing**  
Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
*Attorneys for Defendants*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Case No.: A-21-836019-C  
Dept. No.: XIX

Plaintiffs,

vs.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.; and DOES  
1-10 inclusive,

Defendants.

**NOTICE OF ENTRY OF STIPULATION AND ORDER**

PLEASE TAKE NOTICE that a Stipulation and Order to Vacate Court's July 8, 2021 Order Granting Plaintiffs' Ex Parte Motion for Order Directing the Issuance of a Prejudgment Writ of Attachment Without Notice was entered in the above-entitled matter on the 27th day of July, 2021, a copy of which is attached hereto in the above-entitled matter.

Dated this 27th day of July, 2021.

MARQUIS AURBACH COFFING

By: 

Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
ncrosby@maclaw.com  
*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NOTICE OF ENTRY OF STIPULATION AND ORDER** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 27<sup>th</sup> day of July, 2021. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:<sup>1</sup>

E. Brent Bryson, Esq.  
E. BRENT BRYSON, LTD.  
3202 West Charleston Blvd.  
Las Vegas, Nevada 89102  
Email: ebbesqltd.com

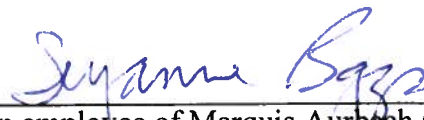
Michael W. Fattorosi, Esq.  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4th Floor  
Woodland Hills, California 91367  
Email: michael@fattlegal.com  
*Pro Hac Vice Application Pending*

Michael D. Kuznetsky, Esq.  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
Email: mike@kuzlaw.com  
*Pro Hac Vice Application Pending*

*Attorneys For Plaintiffs*

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

N/A

  
An employee of Marquis Aurbach Coffing

<sup>1</sup> Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

ELECTRONICALLY SERVED  
7/27/2021 10:12 AMElectronically Filed  
07/27/2021 10:12 AM

CLERK OF THE COURT

1 **SAO**2 **E. BRENT BRYSON, ESQ.**

3 Nevada Bar No.: 004933

4 **E. BRENT BRYSON, LTD.**

5 3202 West Charleston Blvd.

6 Las Vegas, Nevada 89102

7 PH: (702) 364-1234

8 FAX: (702) 364-1442

9 Ebbesqltd@yahoo.com10 *Attorney For Plaintiffs*11 **MICHAEL W. FATTOROSI, ESQ.**

12 California State Bar No.: 193538

13 **LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.**

14 5850 Canoga Avenue, 4th Floor

15 Woodland Hills, California 91367

16 michael@fattlegal.com

17 PH: (818) 710-2727

18 *Pro Hac Vice Application Pending*19 **MICHAEL D. KUZNETSKY, ESQ.**

20 California State Bar No.: 241045

21 **KUZNETSKY LAW GROUP, P.C.**

22 210 N. Pass Avenue, Suite 103

23 Burbank, California 91505

24 mike@kuzlaw.com

25 PH: (818) 753-2450

26 FAX: (818) 736-0999

27 *Pro Hac Vice Application Pending*18 **DISTRICT COURT**19 **CLARK COUNTY, NEVADA**20 **LAUREN COLVIN, an individual; YOUREE**21 **GEMMILL, an individual; and**22 **PATHAMAWAN HANFORD, an individual,**23 **Plaintiffs,**24 **v.**25 **BRITTANYA RAZAVI; MARCELLO**  
26 **RAZAVI; MEOW GANG PRODUCTION**  
27 **STUDIOS, INC.; DG MEDIA &**  
28 **ENTERTAINMENT GROUP, INC.; and**  
**DOES 1-10 inclusive;****Defendants.****Case No.: A-21-836019-C****Dept. No.: XIX****STIPULATION AND ORDER TO  
VACATE COURT'S JULY 8, 2021  
ORDER GRANTING PLAINTIFFS' EX  
PARTE MOTION FOR ORDER  
DIRECTING THE ISSUANCE OF A  
PREJUDGMENT WRIT OF  
ATTACHMENT WITHOUT NOTICE**

COMES NOW, Plaintiffs, LAUREN COLVIN, YOUREE GEMMILL and PATHAMAWAN HANFORD (collectively "Plaintiffs"), by and through their attorney, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., and Defendants Brittanya Razavi, Marcello Razavi, Meow Gang Production Studios, Inc. and DG Media & Entertainment Group, Inc. (collectively "Defendants"), by and through their counsel of record, Nick D. Crosby, Esq. of Marquis Aurbach Coffing, and hereby stipulate and agree that the hearing on August 3, 2021 at 9:30 a.m. regarding Defendants' Motion to Vacate Order or, Alternatively, Discharge Prejudgment Writ of Attachment on Order Shortening Time, be vacated.

It is further stipulated that the Court Order of July 8, 2021 granting Plaintiffs' Ex Parte Motion For Order Directing The Issuance Of A Prejudgment Writ of Attachment Without Notice is hereby immediately vacated and discharged.

It is further stipulated that Defendants do not waive any right, action or claim they may have as a result of the attachment, freezing or hold on their accounts caused by the July 8, 2021 Order.

DATED this 26<sup>th</sup> day of July, 2021.

DATED this 26<sup>th</sup> day of July, 2021.

s/ E. Brent Bryson  
E. Brent Bryson, Esq.  
Nevada Bar No.: 04933  
Law Offices of E. Brent Bryson, Ltd.  
3202 West Charleston Blvd.  
Las Vegas, NV 89102  
(702) 364-1234 Telephone  
Ebbesqltd@yahoo.com  
Attorneys for Plaintiffs

s/ Nick D. Crosby  
Nick D. Crosby, Esq.  
Nevada Bar No.: 08996  
Marquis Aurbach Coffing  
10001 Park Run Drive  
Las Vegas, NV 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com  
Attorneys for Defendants B. Razavi, M. Razavi, Meow Gang Production Studios, Inc. and DG Media & Entertainment Group, Inc.

Case No.: A-21-836019-C  
Colvin, et al v. Razavi, et al

**ORDER**

Based on the foregoing stipulation, it is hereby ORDERED, ADJUDGED AND DECREED that the August 3, 2021, 9:30 a.m. hearing for Defendant's Motion to Vacate Order Or, Alternatively, Discharge Prejudgment Writ Of Attachment On Oder Shortening Time is hereby vacated.

IT IS FURTHER ORDERED that this Court's July 8, 2021 Order granting Plaintiffs' Ex Parte Motion For Order Directing The Issuance Of A Prejudgment Writ of Attachment Without Notice is hereby immediately vacated and dissolved.

IT IS FURTHER ORDERED that any funds held, frozen, restricted or otherwise attached in any of the Defendants' accounts with Chase Bank shall be immediately released to Defendants and any restrictions implemented as a result of the July 8, 2021 Order shall immediately cease.

**IT IS SO ORDERED.**

Dated this 27th day of July, 2021



THE HONORABLE DISTRICT COURT JUDGE  
8D9 3B9 948A D6C5  
Crystal Eller  
District Court Judge

Dated: \_\_\_\_\_

Respectfully Submitted By:

/s/ E. Brent Bryson  
E. Brent Bryson, Esq.  
E. Brent Bryson, Ltd.  
Nevada Bar No.: 004933  
3202 West Charleston Boulevard  
Las Vegas, Nevada 89102  
Attorneys for Plaintiffs

Re: [External] Re: [External] Fw: [External] A-21-836019-C: Colvin, et al v. Razavi, et al: Court Order [IWOV-iManage.FID1149897]

---

From: Nick Crosby (ncrosby@maclaw.com)

To: ebbesqltd@yahoo.com

Cc: sboggs@maclaw.com

Date: Monday, July 26, 2021, 11:48 AM PDT

---

Permission to e-sign and submit to the court. Thank You,

Nick D. Crosby, Esq.  
Marquis Aurbach Coffing  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Office: 702-942-2158

Sent from my iPhone, so please excuse any errors.

On Jul 26, 2021, at 11:34 AM, Eric Bryson <ebbesqltd@yahoo.com> wrote:

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Attached please find Mr. Bryson's stipulation to include your changes.

Please advise if further changes are required or if we have your authorization to affix your electronic signature and submit to DC Inbox Department 19.

Thank you,

Ron Hirsch  
Legal Assistant to:

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<http://www.ebrentbrysonltd.com>

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**To:** Nick Crosby <NCrosby@maclaw.com>  
**Subject:** [External] Fw: [External] A-21-836019-C: Colvin, et al v. Razavi, et al: Court Order [IWOV-iManage.FID1149897]

Dear Mr. Crosby,

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Respectfully,

Ron Hirsch

Legal Assistant to:

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E. BRENT BRYSON, LTD.

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Las Vegas, Nevada 89102

P: 702-364-1234

F: 702-364-1442

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<http://www.ebrentbrysonltd.com>

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1 **CSERV**

2 DISTRICT COURT  
3 CLARK COUNTY, NEVADA

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6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 19

8 Brittanya Razavi, Defendant(s)

9  
10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District  
12 Court. The foregoing Stipulation and Order was served via the court's electronic eFile system  
13 to all recipients registered for e-Service on the above entitled case as listed below:

14 Service Date: 7/27/2021

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20 E. BRYSON	ebbesqltd@yahoo.com
21 Michael Fattorosi	Michael@fattlegal.com
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23 Michael Fattorosi	Michael@fattlegal.com
24 E. Bryson	EBBESQLTD@YAHOO.COM
25 Michael Fattorosi	Michael@fattlegal.com
26 Michael Kuznetsky	Mike@kuzlaw.com

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Michael Kuznetsky

Mike@kuzlaw.com

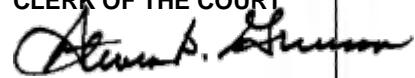
Michael Kuznetsky

Mike@kuzlaw.com

E. Bryson

ebbesqltd@yahoo.com

# **EXHIBIT K**



1 **SUBT**  
2 MICHAEL A. URBAN, ESQ.  
3 Nevada Bar No.: 3875  
4 THE URBAN LAW FIRM  
5 4270 S. Decatur Blvd., Suite A-9  
6 Las Vegas, Nevada 89103  
7 PH: (702) 968-8087  
8 Fax: (702) 968-8088  
9 murban@theurbanlawfirm.com  
10 Attorney for Plaintiffs

11 MICHAEL W. FATTOROSI, ESQ.  
12 California State Bar No.: 193538  
13 LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
14 5850 Canoga Avenue, 4<sup>th</sup> Floor  
15 Woodland Hills, California 91367  
16 Michael@fattlegal.com  
17 PH: (818) 710-2727  
18 *Pro Hac Vice Application Pending*

19 MICHAEL D. KUZNETSKY, ESQ.  
20 California State Bar No.: 241045  
21 KUZNETSKY LAW GROUP, P.C.  
22 210 N. Pass Avenue, Suite 103  
23 Burbank, California 91505  
24 mike@kuzlaw.com  
25 PH: (818) 753-2450  
26 Fax: (818) 736-0999  
27 *Pro Hac Vice Application Pending*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

18 LAUREN COLVIN, an individual; YOUREE  
19 GEMMILL, an individual; and  
20 PATHAMAWAN HANFORD, an individual,

21 Plaintiffs,

22 v.

23 BRITTANYA RAZAVI; MARCELLO  
24 RAZAVI; MEOW GANG PRODUCTION  
25 STUDIOS, INC., DG MEDIA &  
26 ENTERTAINMENT GROUP, INC., and DOES  
27 1-10 inclusive;

28 Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 19

**SUBSTITUTION OF COUNSEL**

///

DocuSign Envelope ID: 0ACEBA73-B81F-43D8-B254-B2ECE36F8FD5

Pursuant to EDCR 7.40, attorney, Michael A. Urban, Esq. of The Urban Law Firm shall substitute in as local counsel for Plaintiffs, Lauren Colvin, an individual; Youree Gemmill, and individual; and Pathamawan Hanford, an individual, in place of attorney E. Brent Bryson, Esq. of E. Brent Bryson, LTD. and E. Brent Bryson, LTD. shall withdraw as counsel in this Action.

All correspondence and filings in this matter to be sent to or served upon the Plaintiffs may be served upon and provided to The Urban Law Firm as follow:

Michael A. Urban, Esq.  
The Urban Law Firm  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103

Mr. Urban will ensure a true and correct copy of this substitution of counsel are served upon the appearing Plaintiffs and other counsel in this matter, through counsel.

Dated: August 4, 2021

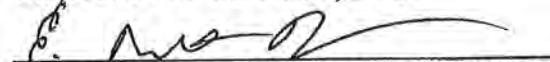
**THE URBAN LAW FIRM**

Decoupled by:  
MICHAEL URBAN

Michael A. Urban, Nevada Bar No. 3875  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, NV 89103  
PH: (702) 968-8087; Fax: (702) 968-8088  
murban@theurbanlawfirm.com

Dated: August 12, 2021

**ERIC BRENT BRYSON, LTD.**

  
Eric Brent Bryson, Nevada Bar No. 004933  
3202 West Charleston Blvd.  
Las Vegas, NV 89102  
PH: (702) 364-1234 Fax: (702) 364-1442  
Ebbesqltd@yahoo.com

Dated: August 04, 2021

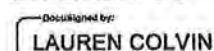
**LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.**

Decoupled by:  
Michael Fattorosi  
Michael W. Fattorosi, California Bar No. 193438  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
PH: (818) 710-2727  
michael@fattlegal.com

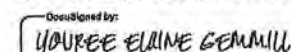
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Dated: August 4, 2021**KUZNETSKY LAW GROUP, P.C.**

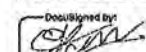

Michael D. Kuznetsky, California Bar No. 241045  
 210 N. Pass Avenue, Suite 103  
 Burbank, California 91505  
 PH: (818) 753-2450 Fax: (818) 736-0999  
 mike@kuzlaw.com

Dated: August 4, 2021**LAUREN COLVIN**


Lauren Colvin  
 Actress  
*Plaintiff*

Dated: August 4, 2021**YOUREE GEMMILL**


Youree Gemmill  
 Actress  
*Plaintiff*

Dated: August 4, 2021**PATHAMAWAN HANFORD**


Pathamawan Hanford  
 Actress  
*Plaintiff*

196535



DocuSign Envelope ID: 0ACEBA73-B81F-43D8-B254-B2ECE36F8FD5

**CERTIFICATE OF SERVICE**

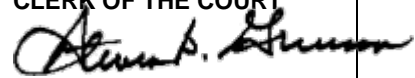
I hereby certify that on the 12<sup>th</sup> day of August, 2021, I electronically filed the foregoing  
**SUBSTITUTION OF COUNSEL** with the Clerk of the Court using the Court's Odyssey  
electronic filing system, which will send notification of such filing to the following:

Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

  
An Employee of The Urban Law Firm

# EXHIBIT L



**MASS**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727  
(Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
Fax: (818) 736-0999  
(Admitted *pro hac vice* under SCR 42)

MICHAEL A. URBAN, ESQ.  
Nevada Bar No.: 3875  
THE URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
PH: (702) 968-8087  
Fax: (702) 968-8088  
murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**MOTION TO ASSOCIATE COUNSEL**

(Michael D. Kuznetsky and  
Michael W. Fattorosi)

**HEARING DATE NOT REQUESTED**

1 Plaintiffs, Lauren Colvin, Youree Gemmill, and Pathamawan Hanford, hereby move the  
 2 Court for an order permitting Michael W. Fattorosi, Esq. and Michael D. Kuznetsky, to practice  
 3 in Nevada pursuant to Nevada Supreme Court Rule 42 (SCR 42).

4 This motion is supported by the attached “Verified Applications for Association of  
 5 Counsel” (Exhibit A); Certificates of Good Standing from the District of California (Exhibit B);  
 6 and the State Bar of Nevada Statements (Exhibit C).

7 Dated: September 16, 2021

**THE URBAN LAW FIRM**

8  
 9 By: /s/ Michael A. Urban  
 10 Michael A. Urban, Nevada Bar No. 3875  
 11 4270 S. Decatur Blvd., Suite A-9  
 12 Las Vegas, Nevada 89103  
 13 T: (702) 968-8087; F: (702) 968-8088  
 14 murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

15  
 16 **NOTICE OF MOTION**

17 TO: All Interested Parties; and

18 TO: All Counsel of Record

19 PLEASE TAKE NOTICE that Plaintiffs, Lauren Colvin, Youree Gemmill, and  
 20 Pathamawan Hanford, will bring the foregoing MOTION TO ASSOCIATE COUNSEL on for  
 21 decision on the \_\_\_\_ day of \_\_\_\_\_, 2021, in Department 19 of the above-entitled  
 22 Court.

23 Dated: September 16, 2021

**THE URBAN LAW FIRM**

24 By: /s/ Michael A. Urban  
 25 Michael A. Urban, Nevada Bar No. 3875  
 26 4270 S. Decatur Blvd., Suite A-9  
 27 Las Vegas, Nevada 89103  
 28 T: (702) 968-8087; F: (702) 968-8088  
 murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of September, 2021, I electronically filed the foregoing **MOTION TO ASSOCIATE COUNSEL** with the Clerk of the Court using the Court's Odyssey File and Serve electronic filing system, which will send notification of such filing to the following:

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
Fax: (818) 736-0999

NICK D. CROSBY, ESQ.  
Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

and I hereby certify that have mailed by United States Postal Service the document to the following non-Odyssey File and Serve participants:

[none]

/s/ Kerri Carder-McCoy  
An Employee of The Urban Law Firm

# EXHIBIT A



3. Petitioner has been retained personally or as a member of the above named law firm by \_\_\_\_\_  
Lauren Colvin, Youree Gemmill, and Pathamawan Hanford to provide legal representation in  
connection with the above-entitled matter now pending before the above referenced court.

4. Since December of 1997, petitioner has been, and presently is, a member of good standing of  
the bar of the highest court of the State of California where petitioner regularly practices  
law.

5. Petitioner was admitted to practice before the following United States District Courts, United  
States Circuit Courts of Appeal, the Supreme Court of the United States, and/or courts of other states  
on the dates indicated for each, and is presently a member in good standing of the bars of said Courts:

DATE ADMITTED

U.S. District Court, Central District of California

December 9, 1997

6. Is Petitioner currently suspended or disbarred in any court? You must answer yes or no. If yes,  
give particulars; e.g., court, jurisdiction, date: No.

7. Is Petitioner currently subject to any disciplinary proceedings by any organization with authority  
at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date,  
status: No.

8. Has Petitioner ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date, status: No.

---



---

9. Has Petitioner ever had any certificate or privilege to appear and practice before any regulatory administrative body suspended or revoked? You must answer yes or no. If yes, give particulars, e.g. date, administrative body, date of suspension or reinstatement: No.

---



---

10. Has Petitioner, either by resignation, withdrawal, or otherwise, ever terminated or attempted to terminate Petitioner's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings? You must answer yes or no. If yes, give particulars: No.

---



---

11. Petitioner, or any member of petitioner's firm, has/have filed the following application(s) to appear as counsel under Nevada Supreme Court Rule 42 during the past three (3) years in the following matter(s), if none, indicate so: *(do not include Federal Pro Hacs)*

<u>Date of Application</u>	<u>Cause</u>	<u>Title of Court Administrative Body or Arbitrator</u>	<u>Was Application Granted or Denied?</u>
----------------------------	--------------	---	---

None.

---



---

(If more space is needed, you may list previous applications on a separate attachment.)

## 12. Nevada Counsel of Record for Petition in this matter is:

(must be the same as the signature on the Nevada Counsel consent page)

<u>Michael</u>	<u>Allan</u>	<u>Urban</u>	<u>3875</u>
First Name	Middle Name	Last Name	NV Bar #

who has offices at The Urban Law Firm

Firm Name/Company

<u>4270 S. Decatur Blvd., Suite A-9</u>	<u>Las Vegas</u>	<u>Clark County</u>
Street Address	City	County

<u>89103</u>	<u>( 702 ) 986-8087</u>
Zip Code	Phone Number

13. The following accurately represents the names and addresses of each party in this matter, WHETHER OR NOT REPRESENTED BY COUNSEL, and the names and addresses of each counsel of record who appeared for said parties: (You may attach as an Exhibit if necessary.)

NAME

MAILING ADDRESS

<u>Lauren Colvin</u>	<u>125 W. 4<sup>th</sup> Street, Apt. 603, Los Angeles, CA 90013</u>
----------------------	--

<u>Youree Gemmill</u>	<u>17995 Cabela Drive, San Diego, CA 92127</u>
-----------------------	--

<u>Pathmawan Hanford</u>	<u>7558 Violet Vista Avenue, Unit 101, Las Vegas, NV 89130</u>
--------------------------	--

<u>See attached for Defendants' information</u>
---

14. Petitioner agrees to comply with the provisions of Nevada Supreme Court Rule 42(3) and (13) and Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada in accordance with provisions as set forth in SCR 42(3) and (13). Petitioner respectfully requests that Petitioner be admitted to practice in the above-entitled court FOR THE PURPOSES OF THIS MATTER ONLY.

15. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.



**Exhibit 13**  
**Additional Party Information**

**Defendants and Defendants' Counsel**

Brittanya Razavi  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

Marcello Razavi  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

Meow Gang Production Studios, Inc.  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

DG Media & Entertainment Group, Inc.  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com

Attorneys for Defendants, B. Razavi, M. Razavi, Meow Gang Production Studios, Inc. and DG Media & Entertainment Group, Inc.

I, Michael Walter Fattorosi, do hereby swear/affirm under penalty of perjury that the assertions  
Print Petitioner Name  
of this application and the following statements are true:

- 1) That I am the Petitioner in the above entitled matter.
- 2) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:
  - (A) I am not a member of the State Bar of Nevada;
  - (B) I am not a resident of the State of Nevada;
  - (C) I am not regularly employed as a lawyer in the State of Nevada;
  - (D) I am not engaged in substantial business, professional, or other activities in the State of Nevada;
  - (E) I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States; and
  - (F) I have associated a lawyer who is an active member in good standing of the State Bar of Nevada as counsel of record in this action or proceeding.
- 2) That I have read the foregoing application and know the contents thereof; that the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to the matter I believe them to be true.

That I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada; that I understand and shall comply with the standards of professional conduct required by members of the State Bar of Nevada; and that I am subject to the disciplinary jurisdiction to the State Bar of Nevada with respect to any of my actions occurring in the course of such appearance.

DATED this 31 day of August, 2021

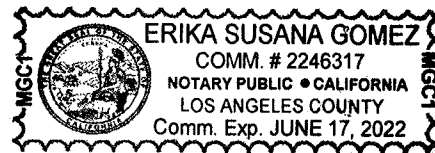


Petitioner/Affiant (blue ink)

STATE OF California )  
COUNTY OF Los Angeles ) ss

Subscribed and sworn to before me

this 31<sup>st</sup> day of August, 2021  
Erika S. Gomez  
Notary Public



**DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL**

SCR 42(14) Responsibilities of Nevada attorney of record.

(a) The Nevada attorney of record shall be responsible for and actively participate in the representation of a client in any proceeding that is subject to this rule.

(b) The Nevada attorney of record shall be present at all motions, pre-trials, or any matters in open court unless otherwise ordered by the court.

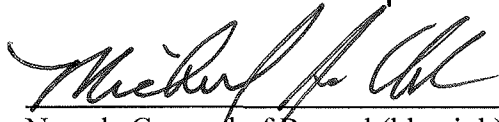
(c) The Nevada attorney of record shall be responsible to the court, arbitrator, mediator, or administrative agency or governmental body for the administration of any proceeding that is subject to this rule and for compliance with all state and local rules of practice. It is the responsibility of Nevada counsel to ensure that the proceeding is tried and managed in accordance with all applicable Nevada procedural and ethical rules.

I Michael Allan Urban hereby agree to associate with Petitioner referenced hereinabove

Print Nevada Counsel Name

and further agree to perform all of the duties and responsibilities as required by Nevada Supreme Court Rule 42.

DATED this 13 day of September, 2021

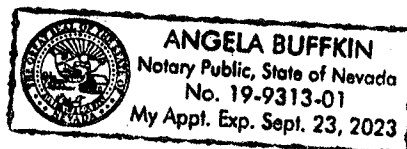
  
Nevada Counsel of Record (blue ink)

STATE OF Nevada )  
 ) ss  
COUNTY OF Clark )

Subscribed and sworn to before me

this 13 day of September, 2021

Angela Buffkin  
Notary Public



**BEFORE THE**



3. Petitioner has been retained personally or as a member of the above named law firm by \_\_\_\_\_ Lauren Colvin, Youree Gemmill, and Pathamawan Hanford to provide legal representation in connection with the above-entitled matter now pending before the above referenced court.

4. Since October of 2008, petitioner has been, and presently is, a member of good standing of the bar of the highest court of the State of California where petitioner regularly practices law.

5. Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States, and/or courts of other states on the dates indicated for each, and is presently a member in good standing of the bars of said Courts:

	<u>DATE ADMITTED</u>
<u>U.S. District Court, Central District of California</u>	<u>October 23, 2008</u>
<u>U.S. District Court, Southern District of California</u>	<u>March 5, 2013</u>
<u>Ninth Circuit Court of Appeals</u>	<u>October 7, 2010</u>

6. Is Petitioner currently suspended or disbarred in any court? You must answer yes or no. If yes, give particulars; e.g., court, jurisdiction, date: No.

7. Is Petitioner currently subject to any disciplinary proceedings by any organization with authority at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date, status: No.

8. Has Petitioner ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law? You must answer yes or no. If yes, give particulars, e.g. court, discipline authority, date, status: No.

---



---

9. Has Petitioner ever had any certificate or privilege to appear and practice before any regulatory administrative body suspended or revoked? You must answer yes or no. If yes, give particulars, e.g. date, administrative body, date of suspension or reinstatement: No.

---



---

10. Has Petitioner, either by resignation, withdrawal, or otherwise, ever terminated or attempted to terminate Petitioner's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings? You must answer yes or no. If yes, give particulars: No.

---



---

11. Petitioner, or any member of petitioner's firm, has/have filed the following application(s) to appear as counsel under Nevada Supreme Court Rule 42 during the past three (3) years in the following matter(s), if none, indicate so: *(do not include Federal Pro Hacs)*

<u>Date of Application</u>	<u>Cause</u>	<u>Title of Court Administrative Body or Arbitrator</u>	<u>Was Application Granted or Denied?</u>
<u>None.</u>			

---



---

(If more space is needed, you may list previous applications on a separate attachment.)

12. Nevada Counsel of Record for Petition in this matter is:

(must be the same as the signature on the Nevada Counsel consent page)

Michael Allan Urban 3875  
 First Name Middle Name Last Name NV Bar #  
 who has offices at The Urban Law Firm  
 Firm Name/Company  
4270 S. Decatur Blvd., Suite A-9 , Las Vegas , Clark County  
 Street Address City County  
89103 , ( 702 ) 986-8087  
 Zip Code Phone Number

13. The following accurately represents the names and addresses of each party in this matter, WHETHER OR NOT REPRESENTED BY COUNSEL, and the names and addresses of each counsel of record who appeared for said parties: (You may attach as an Exhibit if necessary.)

NAME

MAILING ADDRESS

Lauren Colvin 125 W. 4<sup>th</sup> Street, Apt. 603, Los Angeles, CA 90013  
Youree Gemmill 17995 Cabela Drive, San Diego, CA 92127  
Pathmawan Hanford 7558 Violet Vista Avenue, Unit 101, Las Vegas, NV 89130  
See attached for Defendants' information

14. Petitioner agrees to comply with the provisions of Nevada Supreme Court Rule 42(3) and (13) and Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada in accordance with provisions as set forth in SCR 42(3) and (13). Petitioner respectfully requests that Petitioner be admitted to practice in the above-entitled court FOR THE PURPOSES OF THIS MATTER ONLY.

15. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.



**Exhibit 13**  
**Additional Party Information**

Defendants and Defendants' Counsel

Brittanya Razavi  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

Marcello Razavi  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

Meow Gang Production Studios, Inc.  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

DG Media & Entertainment Group, Inc.  
10300 Mystic Ledge Court  
Las Vegas, NV 89149-1271

Nick D. Crosby, Esq.  
Nevada Bar No. 8996  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone: (702) 382-0711  
Facsimile: (702) 382-5816  
ncrosby@maclaw.com

Attorneys for Defendants, B. Razavi, M. Razavi, Meow Gang Production Studios, Inc. and DG Media & Entertainment Group, Inc.

I, Michael David Kuznetsky, do hereby swear/affirm under penalty of perjury that the assertions  
Print Petitioner Name  
of this application and the following statements are true:

1) That I am the Petitioner in the above entitled matter.

2) That I have read Supreme Court Rule (SCR) 42 and meet all requirements contained therein, including, without limitation, the requirements set forth in SCR 42(2), as follows:

- (A) I am not a member of the State Bar of Nevada;
- (B) I am not a resident of the State of Nevada;
- (C) I am not regularly employed as a lawyer in the State of Nevada;
- (D) I am not engaged in substantial business, professional, or other activities in the State of Nevada;
- (E) I am a member in good standing and eligible to practice before the bar of any jurisdiction of the United States; and
- (F) I have associated a lawyer who is an active member in good standing of the State Bar of Nevada as counsel of record in this action or proceeding.

2) That I have read the foregoing application and know the contents thereof; that the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to the matter I believe them to be true.

That I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada; that I understand and shall comply with the standards of professional conduct required by members of the State Bar of Nevada; and that I am subject to the disciplinary jurisdiction to the State Bar of Nevada with respect to any of my actions occurring in the course of such appearance.

DATED this 8<sup>th</sup> day of September, 2021

[Signature]  
Petitioner/Affiant (blue ink)

STATE OF California )  
COUNTY OF Los Angeles ) ss

Subscribed and sworn to before me

this 8<sup>th</sup> day of September, 2021  
Erika S. Gomez [Signature]  
Notary Public



**DESIGNATION, CERTIFICATION AND CONSENT OF NEVADA COUNSEL**

SCR 42(14) Responsibilities of Nevada attorney of record.

(a) The Nevada attorney of record shall be responsible for and actively participate in the representation of a client in any proceeding that is subject to this rule.

(b) The Nevada attorney of record shall be present at all motions, pre-trials, or any matters in open court unless otherwise ordered by the court.

(c) The Nevada attorney of record shall be responsible to the court, arbitrator, mediator, or administrative agency or governmental body for the administration of any proceeding that is subject to this rule and for compliance with all state and local rules of practice. It is the responsibility of Nevada counsel to ensure that the proceeding is tried and managed in accordance with all applicable Nevada procedural and ethical rules.

I Michael Allan Urban hereby agree to associate with Petitioner referenced hereinabove

Print Nevada Counsel Name

and further agree to perform all of the duties and responsibilities as required by Nevada Supreme Court Rule 42.

DATED this 13 day of September, 20 21

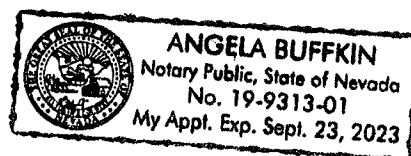
  
Nevada Counsel of Record (blue ink)

STATE OF Nevada )  
 ) ss  
COUNTY OF Clark )

Subscribed and sworn to before me

this 13 day of September, 20 21

Angela Buffkin  
Notary Public



# EXHIBIT B



The State Bar  
*of California*

180 Howard Street, San Francisco, CA 94105

OFFICE OF ATTORNEY REGULATION &  
CONSUMER RESOURCES

AttorneyRegulation@calbar.ca.gov  
888-800-3400

## CERTIFICATE OF STANDING

September 3, 2021

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MICHAEL WALTER FATTOROSI, #193538 was admitted to the practice of law in this state by the Supreme Court of California on December 9, 1997 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Louise Turner".

Louise Turner  
Custodian of Records



The State Bar  
*of California*

180 Howard Street, San Francisco, CA 94105

OFFICE OF ATTORNEY REGULATION &  
CONSUMER RESOURCES

AttorneyRegulation@calbar.ca.gov  
888-800-3400

## CERTIFICATE OF STANDING

September 3, 2021

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MICHAEL DAVID KUZNETSKY, #241045 was admitted to the practice of law in this state by the Supreme Court of California on December 12, 2005 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Louise Turner".

Louise Turner  
Custodian of Records

# EXHIBIT C



1 STAT

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4 Case No. A-21-836019-C  
5 Dept. No. XIX

6 Lauren Colvin

7 vs.

8 Brittanya Razavi  
9 \_\_\_\_\_/

10 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE  
11 42 (3) (b)

12  
13 THE STATE BAR OF NEVADA, in response to the application of  
Petitioner, submits the following statement pursuant to SCR42(3):

14 SCR42(6)**Discretion.** The granting or denial of a motion to associate  
15 counsel pursuant to this rule by the court is discretionary. The  
16 court, arbitrator, mediator, or administrative or governmental  
17 hearing officer may revoke the authority of the person permitted to  
18 appear under this rule. Absent special circumstances, repeated  
appearances by any person or firm of attorneys pursuant to this rule  
shall be cause for denial of the motion to associate such person.

19 (a) **Limitation.** It shall be presumed, absent special  
20 circumstances, and only upon showing of good cause, that  
21 more than 5 appearances by any attorney granted under  
this rule in a 3-year period is excessive use of this  
rule.

22 (b) **Burden on applicant.** The applicant shall have the  
23 burden to establish special circumstances and good cause  
24 for an appearance in excess of the limitation set forth  
25 in subsection 6(a) of this rule. The applicant shall set  
forth the special circumstances and good cause in an  
affidavit attached to the original verified application.

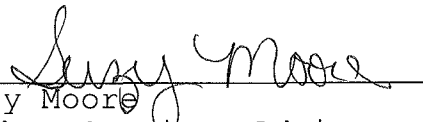
26 1. DATE OF APPLICATION: 9/14/2021

27 2. APPLYING ATTORNEY: Michael Walter Fattorosi, Esq.

28 ///  
///  
///

3. FIRM NAME AND ADDRESS: Law Office of Michael W. Fattorosi, 5850 Canoga Avenue, 4th Floor, Woodland Hills, CA 91367
4. NEVADA COUNSEL OF RECORD: Michael Allan Urban, Esq., The Urban Law Firm, 4270 S. Decatur Blvd., Suite A-9, Las Vegas, NV 89103
5. There is no record of previous applications for appearance by petitioner within the past three (3) years.

DATED this September 14, 2021

  
Suzy Moore  
Member Services Admin.  
Pro Hac Vice Processor  
STATE BAR OF NEVADA

1 STAT

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4 Case No. A-21-836019-C  
5 Dept. No. XIX

6 Lauren Colvin

7 vs.

8 Brittanya Razavi  
9 \_\_\_\_\_ /

10 STATE BAR OF NEVADA STATEMENT PURSUANT TO SUPREME COURT RULE  
11 42 (3) (b)

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13 THE STATE BAR OF NEVADA, in response to the application of  
Petitioner, submits the following statement pursuant to SCR42(3):

14 SCR42(6)**Discretion.** The granting or denial of a motion to associate  
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17 hearing officer may revoke the authority of the person permitted to  
18 appear under this rule. Absent special circumstances, repeated  
appearances by any person or firm of attorneys pursuant to this rule  
shall be cause for denial of the motion to associate such person.

19 (a) **Limitation.** It shall be presumed, absent special  
20 circumstances, and only upon showing of good cause, that  
21 more than 5 appearances by any attorney granted under  
this rule in a 3-year period is excessive use of this  
rule.

22 (b) **Burden on applicant.** The applicant shall have the  
23 burden to establish special circumstances and good cause  
24 for an appearance in excess of the limitation set forth  
25 in subsection 6(a) of this rule. The applicant shall set  
26 forth the special circumstances and good cause in an  
27 affidavit attached to the original verified application.

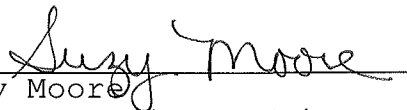
28 1. DATE OF APPLICATION: 9/14/2021

2. APPLYING ATTORNEY: Michael David Kuznetsky, Esq.

///  
///  
///

- 1 3. FIRM NAME AND ADDRESS: Kuznetsky Law Group, P.C., 210 N. pass  
2 Avenue, Suite 103, Burbank, CA 91604
- 3 4. NEVADA COUNSEL OF RECORD: Michael Allan Urban, Esq., The Urban  
4 Law Firm, 4270 S. Decatur Blvd., Suite A-9, Las Vegas, NV 89103
- 5 5. There is no record of previous applications for appearance by  
6 petitioner within the past three (3) years.

7 DATED this September 14, 2021

8  
9   
10 Suzy Moore  
11 Member Services Admin.  
12 Pro Hac Vice Processor  
13 STATE BAR OF NEVADA  
14  
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28

# PROPOSED ORDER (FATTOROSI)

**OGM**

MICHAEL W. FATTOROSI, ESQ.  
 California State Bar No.: 193538  
 LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
 5850 Canoga Avenue, 4<sup>th</sup> Floor  
 Woodland Hills, California 91367  
 Michael@fattlegal.com  
 PH: (818) 710-2727  
 (Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ  
 California State Bar No.: 241045  
 KUZNETSKY LAW GROUP, P.C.  
 210 N. Pass Avenue, Suite 103  
 Burbank, California 91505  
 mike@kuzlaw.com  
 PH: (818) 753-2450  
 Fax: (818) 736-0999  
 (Admitted *pro hac vice* under SCR 42)

MICHAEL A. URBAN, ESQ.  
 Nevada Bar No.: 3875  
 THE URBAN LAW FIRM  
 4270 S. Decatur Blvd., Suite A-9  
 Las Vegas, Nevada 89103  
 PH: (702) 968-8087  
 Fax: (702) 968-8088  
 murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
 GEMMILL, an individual; and  
 PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
 RAZAVI; MEOW GANG PRODUCTION  
 STUDIOS, INC., DG MEDIA &  
 ENTERTAINMENT GROUP, INC., and DOES  
 1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**ORDER GRANTING MOTION TO  
 ASSOCIATE COUNSEL**

(Michael Fattorosi)

**ORDER ADMITTING TO PRACTICE**

**MICHAEL W. FATTOROSI, ESQ.**, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of California and the State Bar of California Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

**ORDERED**, that said application is hereby granted, and **MICHAEL W. FATTOROSI, ESQ.** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
DISTRICT JUDGE

Submitted by:

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875

4270 S. Decatur Blvd., Suite A-9

Las Vegas, Nevada 89103

T: (702) 968-8087; F: (702) 968-8088

murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

# PROPOSED ORDER (KUZNETSKY)



**OGM**

MICHAEL W. FATTOROSI, ESQ.  
 California State Bar No.: 193538  
 LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
 5850 Canoga Avenue, 4<sup>th</sup> Floor  
 Woodland Hills, California 91367  
 Michael@fattlegal.com  
 PH: (818) 710-2727  
 (Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ  
 California State Bar No.: 241045  
 KUZNETSKY LAW GROUP, P.C.  
 210 N. Pass Avenue, Suite 103  
 Burbank, California 91505  
 mike@kuzlaw.com  
 PH: (818) 753-2450  
 Fax: (818) 736-0999  
 (Admitted *pro hac vice* under SCR 42)

MICHAEL A. URBAN, ESQ.  
 Nevada Bar No.: 3875  
 THE URBAN LAW FIRM  
 4270 S. Decatur Blvd., Suite A-9  
 Las Vegas, Nevada 89103  
 PH: (702) 968-8087  
 Fax: (702) 968-8088  
 murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
 GEMMILL, an individual; and  
 PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
 RAZAVI; MEOW GANG PRODUCTION  
 STUDIOS, INC., DG MEDIA &  
 ENTERTAINMENT GROUP, INC., and DOES  
 1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**ORDER GRANTING MOTION TO  
 ASSOCIATE COUNSEL**

(Michael Kuznetsky)

**ORDER ADMITTING TO PRACTICE**

**MICHAEL D. KUZNETSKY, ESQ.**, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of California and the State Bar of California Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

**ORDERED**, that said application is hereby granted, and **MICHAEL D. KUZNETSKY, ESQ.** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
DISTRICT JUDGE

Submitted by:

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875

4270 S. Decatur Blvd., Suite A-9

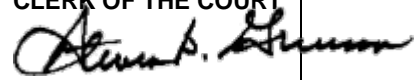
Las Vegas, Nevada 89103

T: (702) 968-8087; F: (702) 968-8088

murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

# **EXHIBIT M**



**DISTRICT COURT  
CLARK COUNTY, NEVADA**

\*\*\*\*

Lauren Colvin, Plaintiff(s)

vs.

Brittanya Razavi, Defendant(s)

Case No.: A-21-836019-C

Department 11

**NOTICE OF HEARING**

Please be advised that the Plaintiffs' Motion to Associate Counsel in the above-entitled matter is set for hearing as follows:

**Date:** October 22, 2021

**Time:** Chambers

**Location:** Chambers  
Regional Justice Center  
200 Lewis Ave.  
Las Vegas, NV 89101

**NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.**

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Chaunte Pleasant  
Deputy Clerk of the Court

**CERTIFICATE OF SERVICE**

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Chaunte Pleasant  
Deputy Clerk of the Court

# **EXHIBIT N**



**Marquis Aurbach Coffing**  
 Nick D. Crosby, Esq.  
 Nevada Bar No. 8996  
 10001 Park Run Drive  
 Las Vegas, Nevada 89145  
 Telephone: (702) 382-0711  
 Facsimile: (702) 382-5816  
 ncrosby@maclaw.com  
*Attorneys for Defendants*

**DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
 GEMMILL, an individual; and  
 PATHAMAWAN HANFORD, an individual,

Case No.: A-21-836019-C  
 Dept. No.: XI

Plaintiffs,

vs.

BRITTANYA RAZAVI; MARCELLO  
 RAZAVI; MEOW GANG PRODUCTION  
 STUDIOS, INC.; DG MEDIA &  
 ENTERTAINMENT GROUP, INC.; and DOES  
 1-10 inclusive,

Defendants.

**DEFENDANTS' OPPOSITION TO MOTION TO ASSOCIATE COUNSEL**

Defendants, Brittanya Razavi ("Brittanya"), Marcello Razavi ("Marcello"), Meow Gang  
 Production Studios, Inc. ("Meow"), and DG Media & Entertainment Group, Inc. ("DG")  
 (collectively "Defendants"), by and through their attorneys of record, Nick D. Crosby, Esq., with  
 the law firm of Marquis Aurbach Coffing, hereby files this Opposition to Plaintiffs' Motion to  
 Associate Counsel in the above-referenced matter.

///

///

///

///

This Opposition is made and based upon the attached Memorandum of Points and Authorities, all pleadings and papers on file herein, and any oral argument allowed at the time of the hearing.

Dated this 24th day of September, 2021.

MARQUIS AURBACH COFFING

By: /s/ Nick D. Crosby  
 Nick D. Crosby, Esq.  
 Nevada Bar No. 8996  
 10001 Park Run Drive  
 Las Vegas, Nevada 89145  
*Attorneys for Defendants*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. INTRODUCTION**

Plaintiffs' Motion to Associate Counsel should be denied because out-of-state counsel appeared in this matter prior to approval from the Court, in violation of SCR 42. Indeed, prior to current local counsel's appearance in the case, attorney Michael Fattorosi, Esq. ("Fattorosi") filed an affidavit in support of an Ex Parte Motion for Writ of Attachment Without Notice. Fattorosi was not approved by the Court to make such an appearance and, as a result of his representations, the Court erroneously issued a prejudgment writ of attachment which violated Nevada law. Counsel failed to secure a bond for the prejudgment writ of attachment and did not – in any meaningful way – comply with Nevada law regarding writs of attachment or garnishment. For these reasons, the Motion to Associate Counsel, as it relates to Fattorosi, should be denied.

### **II. STATEMENT OF RELEVANT FACTS**

The lawsuit is a dispute between three licensees (the Plaintiffs) and Defendant DG and Meow. Plaintiffs filed a Complaint against the Defendants, then moved for an Ex Parte Writ of Attachment Without Notice. Despite the fact Plaintiffs did not comply with chapter 31 of Nevada Revised Statute in obtaining a writ of attachment, the Court issued an order directing the issuance of a writ of attachment. Plaintiffs did not file a notice of written undertaking with the

1 Court, which is required by Nevada Revised Statute 31.030. Despite their non-compliance with  
2 the statute, Plaintiffs then served the order directing the issuance of a writ of attachment upon  
3 Chase Bank, subsequently freezing all of Defendants' bank accounts with Chase Bank.

4 In support of the Ex Parte Motion for Writ of Attachment Without Notice ("Writ  
5 Motion"), Fattorosi submitted an affidavit. (**Exhibit A**). In the Affidavit, Fattorosi identified  
6 himself as "an attorney for the Plaintiffs, in the foregoing action" and alleged factual allegations  
7 in support of the Writ Motion. (Id. Afft. Fattorosi, ¶ 1). Notably, Fattorosi alleged (without any  
8 evidence) that the Defendants purchased four properties and transferred the properties into trust  
9 "to shield themselves from their personal liability." (Id. at ¶ 3).

10 Plaintiffs' prior local counsel, E. Brent Bryson, Esq., refused to discharge the unlawful  
11 writ of attachment, despite his acknowledgement that Plaintiffs failed to comply with the statute  
12 governing the issuance of writs of attachment and garnishment. It was not until Defendants filed  
13 a Motion to Discharge the Writ of Attachment that Plaintiffs' counsel, Mr. Bryson, agreed to  
14 release the unlawful writ of attachment.

### 15 **III. LEGAL ARGUMENT**

16 Nevada Supreme Court Rule 42 governs the practice of law by attorneys not licensed in  
17 Nevada. In addition to the filing and verification requirements set forth in SCR 42, the Rule  
18 clearly states, in relevant part:

19 **5. Appearances by out-of-state counsel.** An applicant *shall not appear in*  
20 *a proceeding subject to this rule until the court*, arbitrator, mediator, or  
21 administrative or governmental agency where the action is pending enters an  
22 order granting the motion to associate.

23 SCR 42(5) (emphasis added).

24 Here, Fattorosi undoubtedly appeared in this proceeding prior to the entry of an order  
25 granting any motion to associate. Indeed, the instant Motion was not filed until 3 months after  
26 Fattorosi first appeared before this Court through his Affidavit in Support of Ex Parte Motion for  
27 Prejudgment Writ of Attachment Without Notice. As such, Fattorosi violated SCR 42 – the very  
28 rule relied upon in the Motion – and he should not be allowed to practice in this matter.



1 Certainly Mr. Bryson (former local counsel) was aware of the requirements of SCR 42, yet he  
2 allowed Fattorosi to appear before this Court, nonetheless, without first obtaining permission  
3 from this Court. Given the foregoing, Defendants respectfully request the Motion be denied as it  
4 relates to Fattorosi.

5 **IV. CONCLUSION**

6 Fattorosi appeared in this matter via an affidavit in support of the Writ Motion – an  
7 appearance which resulted in the unlawful issuance and execution of a writ of attachment. At the  
8 time the Affidavit was submitted to the Court, Fattorosi had not been given permission from the  
9 Court to appear and, therefore, violated SCR 42(5), in addition to violating Nevada Revised  
10 Statute chapter 31. For the foregoing reasons, the Motion to Associate Counsel should be denied  
11 as it relates to Fattorosi.

12 Dated this 24th day of September, 2021.

13 MARQUIS AURBACH COFFING

14  
15 By: /s/ Nick D. Crosby  
16 Nick D. Crosby, Esq.  
17 Nevada Bar No. 8996  
18 10001 Park Run Drive  
19 Las Vegas, Nevada 89145  
20 *Attorneys for Defendants*  
21  
22  
23  
24  
25  
26  
27  
28

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

MARQUIS AURBACH COFFING

10001 Park Run Drive  
Las Vegas, Nevada 89145  
(702) 382-0711 FAX: (702) 382-5816

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **DEFENDANTS' OPPOSITION TO MOTION TO ASSOCIATE COUNSEL** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 24th day of September, 2021. Electronic service of the foregoing document shall be made in accordance with the E-Service List as follows:<sup>1</sup>

Michael W. Fattorosi, Esq.  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4th Floor  
Woodland Hills, California 91367  
Email: michael@fattlegal.com  
*Pro Hac Vice Application Pending*

Michael D. Kuznetsky, Esq.  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
Email: mike@kuzlaw.com  
*Pro Hac Vice Application Pending*

Michael A. Urban, Esq.  
THE URBAN LAW FIRM  
4270 So. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
(702) 968-8087  
Email: murban@theurbanlawfirm.com

*Attorneys For Plaintiffs*

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to:

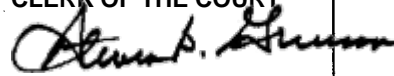
N/A

/s/ Rosie Wesp  
an employee of Marquis Aurbach Coffing

<sup>1</sup> Pursuant to EDCR 8.05(a), each party who submits an E-Filed document through the E-Filing System consents to electronic service in accordance with NRCP 5(b)(2)(D).

# Exhibit A

Electronically Filed  
6/10/2021 2:01 PM  
Steven D. Grierson  
CLERK OF THE COURT


**EXMT (CIV)**

E. BRENT BRYSON, ESQ.  
Nevada Bar No.: 004933  
E. BRENT BRYSON, LTD.  
3202 West Charleston Blvd.  
Las Vegas, Nevada 89102  
PH: (702) 364-1234  
FAX: (702) 364-1442  
Ebbesqltd@yahoo.com  
*Attorneys For Plaintiffs*

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4th Floor  
Woodland Hills, California 91367  
michael@fattlegal.com  
PH: (818) 710-2727  
*Pro Hac Vice Application Pending*

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
FAX: (818) 736-0999  
*Pro Hac Vice Application Pending*

**DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual;  
YOUREE GEMMILL, an individual;  
and PATHAMAWAN HANFORD,  
an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI;  
MARCELLO RAZAVI; MEOW  
GANG PRODUCTION STUDIOS,  
INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.;  
and DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XIX

**EX PARTE MOTION FOR ORDER**  
**DIRECTING THE ISSUANCE OF A**  
**PREJUDGMENT WRIT OF ATTACHMENT**  
**WITHOUT NOTICE**

///

///

COMES NOW, Plaintiffs, LAUREN COLVIN (hereinafter "Colvin"), YOUREE GEMMILL (hereinafter "Gemmill"), and PATHAMAWAN HANFORD (hereinafter "Hanford"), by and through their attorneys, E. Brent Bryson, Esq., of the law offices of E. Brent Bryson, Ltd., Michael W. Fattorosi, Esq. of Michael W. Fattorosi, P.C., and Michael Kuznetsky, Esq., of Kuznetsky Law Group, P.C., and move this court, without notice and hearing, pursuant to NRS Chapter 31, for an order directing the issuance of a prejudgment writ of attachment without notice. This Motion is made and based upon the following Memorandum of Points and Authorities and the Affidavits of Plaintiff, Lauren Colvin and Michael W. Fattorosi, Esq.

DATED this 10<sup>th</sup> day of June, 2021.

E. BRENT BRYSON, LTD.

By: /s/ E. Brent Bryson

E. BRENT BRYSON, ESQ.

Nevada Bar No.: 4933

3202 West Charleston Blvd.

Las Vegas, NV 89102

*Attorney for Plaintiffs*

## **MEMORANDUM OF POINTS AND AUTHORITIES**

### **I. FACTS**

This is an action brought by the Plaintiffs against the Defendants as a result of the Defendants' wrongfully taking monies that rightfully belonged to the Plaintiffs.

That from approximately July 2020 to January 2021, Defendant, Brittanya Razavi (hereinafter "Brittanya"), aided and abetted by Defendants Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., fraudulently embezzled all net income earned by Plaintiffs. In particular, Defendants embezzled \$473,445.10 from Colvin, \$38,086.02 from Gemmill, and \$52,862.09 from Hanford. When the fraud was discovered, Brittanya terminated all contact with the Plaintiffs and refused to return the embezzled funds. As

such, Defendants, and each of them, are liable for fraud, conversion, and unjust enrichment which may include a recovery of punitive damages under NRS 42.005(1) and attorneys' fees. Plaintiffs in this matter seeks compensatory and punitive damages totaling \$2,584,728.51. Additionally, Plaintiffs have recently learned the Defendants are in the process of searching for real estate to purchase worth approximately four million dollars (\$4,000,000) cash. Such cash payment it is asserted upon information and belief would include all of the money embezzled from Plaintiffs.

## II. STATEMENT OF LAW

NRS 31.017 authorizes this Court to order the Clerk to issue a writ of attachment, without notice and hearing. NRS 31.017 states in pertinent part:

The court may order the writ of attachment issued without notice to the defendant only in the following cases:

...

(3) In an action for the recovery of the value of personal property, where such personal property is owned by the plaintiff and has been taken or converted by the defendant without the consent of the plaintiff.

...

(5) Where the defendant is about to give, assign, hypothecate, pledge, dispose of or conceal the defendant's money or property or any part thereof and the defendant's money or property remaining in this State or that remaining unconcealed will be insufficient to satisfy the plaintiff's claim.

(6) In an action for the recovery of money or property, or the proceeds thereof, obtained from the plaintiff by the defendant through embezzlement, forgery, larceny or extortion.

In the instant case, a prejudgment Writ of Attachment is necessary to preserve Plaintiffs' rights because Defendants are actively seeking to spend all of their available cash and all funds embezzled from Plaintiffs, which would make Defendants judgment-proof and deprive Plaintiffs of a recovery. A prejudgment Writ of Attachment is expressly authorized by three separate and disjunctive subsections of NRS 31.017, in that (1) Plaintiffs seek to recover a specific amount of funds converted by Defendants (subsection 3); (2) Defendants are about to hypothecate/dispose of Plaintiffs' money to purchase real estate (subsection 5); and (3) Plaintiffs seek to recover funds that

1 were fraudulently embezzled from them (subsection 6).

2 In particular, Plaintiffs are concerned with the money within Defendants' bank accounts  
3 located at Chase Bank, as well as real property located in Las Vegas.

4 The attached Affidavit of Plaintiff Lauren Colvin meets the requirement of NRS 31.020(2).  
5

6 **CONCLUSION**

7 Based upon the foregoing, Plaintiffs respectfully request that the Court order a Writ of  
8 Attachment to issue and attach property located within the greater metropolitan area of Las Vegas,  
9 Nevada, bank accounts and/or safety deposit boxes, including, but not limited to, Chase Bank, in  
10 the names of Brittanya Razavi, Marcello Razavi, Meow Gang Production Studios, Inc., DG Media  
11 & Entertainment Group, Inc., and any entities which either Brittanya Razavi and/or Marcello  
12 Razavi directs or is a signatory upon.  
13

14 DATED this 10<sup>th</sup> day of June, 2021.

15 E. BRENT BRYSON, LTD.

16 By: /s/ E. Brent Bryson  
17 E. BRENT BRYSON, ESQ.  
18 Nevada Bar No.: 4933  
19 3202 West Charleston Blvd.  
20 Las Vegas, NV 89102  
21 *Attorneys for Plaintiffs*  
22  
23  
24  
25  
26  
27  
28

STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

1. That Affiant is a Plaintiff in an action now pending in the Eighth Judicial District Clark County, Nevada. That Affiant makes this Affidavit of facts personally known by her which she would be competent to testify in a court of law.

3. During the period of July 2020 to January 2021, Brittanya Razavi, aided and abetted by Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, embezzled 100% of the net income earned by Affiant from OnlyFans by directly transferring the net income to Defendants' bank accounts, including at Chase Bank. Such total net income earned by Affiant was worth \$946,890.20.

5. Said money of Affiant has been and continues to be wrongfully detained. Therefore, it has a valid claim for fraud, conversion, and unjust enrichment.

6. On or about August 2020, Affiant learned that Brittanya and Marcelo Razavi are actively looking to purchase residential real estate in Las Vegas, Nevada, for cash, worth approximately four million dollars.



1           7. To the best of Affiant's knowledge, Brittany and Marcelo Razavi intend to use all  
2 the money embezzled from affiant and the other Plaintiffs in this case to purchase property for four  
3 million dollars. Upon information and belief, the ownership of such property will then be  
4 transferred into a trust.

5           **FURTHER, AFFIANT SAYETH NAUGHT.**

6  
7   
8 LAUREN COLVIN

9           Subscribed and sworn to before me  
10 this \_\_\_\_ day of \_\_\_\_\_, 2021.

11 \_\_\_\_\_  
12 Notary Public in and for said  
13 County and State  
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# JURAT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

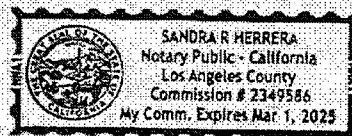
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 2 day of June

2021 by Lauren Colvin

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Sandra R. Herrera  
Signature (Seal)



## OPTIONAL INFORMATION

### DESCRIPTION OF THE ATTACHED DOCUMENT

Affidavit of  
(Title or description of attached document)

Plaintiff Lauren Colvin  
(Title or description of attached document continued)

Number of Pages \_\_\_\_\_ Document Date \_\_\_\_\_

Additional Information \_\_\_\_\_

## INSTRUCTIONS

The wording of all Jurats completed in California after January 1, 2015 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain the proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and county information must be the state and county where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of the document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
  - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
  - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document with a staple.



STATE OF NEVADA )  
 ) ss:  
COUNTY OF CLARK )

That he is an attorney licensed to practice law in the State of California and his application to appear in this action *pro hac vice* is following.

2. To the best of Affiant's knowledge, during the period of July 2020 to January 2021, Brittanya Razavi, aided and abetted by Marcello Razavi, Meow Gang Production Studios, Inc., and DG Media & Entertainment Group, Inc., embezzled 100% of the net income earned by Plaintiffs Lauren Colvin, Youree Gemmill, and Pathamawan Hanford by directly transferring monies into Defendants' bank accounts, including at Chase Bank. Such total net income embezzled was worth \$946,890.20.

3. Brittany and Marcelo Razavi have purchased and own at least four residential properties in Las Vegas Nevada. To the best of Affiant's knowledge, each of these properties were purchased in cash and initially transferred into a trust to shield them from their personal liability. Such properties include the following:

a. 8956 Aurora Bay Court, Las Vegas, Nevada; currently owned by Razavi Brittany McCall Revocable Living Trust dated April 1, 2019, for which Brittany Razavi is the trustee;

168

b. 9303 Gilcrease Avenue, Unit 1, Las Vegas, Nevada; currently owned by Razavi Brittanya McCall Revocable Living Trust dated April 1, 2019, for which Brittany Razavi is the trustee;

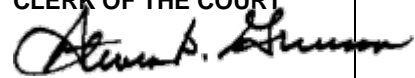
c. 9522 Michelle Falls Avenue, Las Vegas, Nevada; previously owned by The Brittanya McCall Razavi Revocable Spenthrift Trust dated April 1, 2019, for which Brittany Razavi was the trustee; and currently owned by 3725 Seneca Highlands LLC, a Nevada limited liability company, for which Brittanya Razavi is the managing member; and

d. 10550 West Alexander Road, Unit 2130, Las Vegas, Nevada; currently owned by Family Faith Fortune Irrevocable Trust, dated April 28, 2017, with Marcello Razavi listed as a trustee.

**FURTHER, AFFLIANT SAYETH NAUGHT.**

~~MICHAEL W. FATTOROSI~~

# EXHIBIT O

**RIS**

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Attorney for Plaintiffs

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FAX: (818) 736-0999

**DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, YOUREE GEMMILL,  
and PATHAMAWAN HANFORD,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC.; DG MEDIA &  
ENTERTAINMENT GROUP, INC.; and  
DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: XI

**REPLY BRIEF IN SUPPORT OF  
MOTION TO ASSOCIATE COUNSEL**

///

///

///

1                   **REPLY BRIEF IN SUPPORT OF MOTION TO ASSOCIATE COUNSEL**

2                   Plaintiffs Lauren Colvin, Youree Gemmill, and Pathamawan Hanford, by and through their  
3 undersigned attorneys of record, hereby submit this Reply Brief in Support of Motion to Associate  
4 Counsel.

5                   **I. INTRODUCTION**

6                   Defendants concede that the Motion to Associate Counsel is substantively and procedurally  
7 proper. Defendants further concede that they have no opposition to the association of Michael D.  
8 Kuznetsky in this matter. Defendants' sole objection to the Motion to Associate Counsel is the  
9 allegation that Mr. Fattorosi made an "appearance" in the action by signing an affidavit in support  
10 of Plaintiffs' motion for prejudgment writ of attachment ("Motion"). Defendants have set forth no  
11 authority or facts in support.

12                  **II. LEGAL ARGUMENT**

13                               **To constitute an appearance, one must seek judgment or adjudication on some**  
14                               **question;** although an act may relate to a pending case, it does not constitute a  
15                               general appearance if it in no way recognizes that the cause is properly pending or  
                                  that the court has jurisdiction, and no affirmative action is sought from the court.  
                                  (4 Am. Jur. 2d Appearance § 1, emphasis added.)

16                  Plaintiff's former counsel, Mr. Bryson, signed and filed the Motion that included Mr.  
17 Fattorosi's affidavit. The affidavit itself seeks no relief and does not ask the Court to make any  
18 determinations of fact or law. Instead, it sets forth Mr. Fattorosi's personal knowledge as relevant  
19 to the Motion. Such an affidavit would be plainly permissible by an out-of-state attorney witness  
20 that does not represent a party in the action without a pro hac vice application. Likewise, identifying  
21 himself as an attorney for Plaintiffs does not constitute an appearance; such attorney-client  
22 representation is a prerequisite for filing an application to appear pro hac vice in a case. (See Nev.  
23 Sup. Ct. R. 42(2), "Who may apply. A lawyer who has been retained to represent a client in this  
24 state in an action or proceeding set forth in subsection 1(a) of this rule may file a written application  
25 to appear as counsel in that action or proceeding ...")

26                  Even if signing an affidavit had constituted an inadvertent appearance, the Court retains  
27 discretion to grant the Motion to Associate Counsel. (See Nev. Sup. Ct. R. 42(6).) The affidavit  
28 was procured and filed by Mr. Bryson. Mr. Fattorosi has taken no other action in the State of

1 Nevada in connection with the case, and relied on Mr. Bryson's counsel as to what was allowable  
 2 in connection with the Motion. As such, Mr. Fattorosi did not sign the complaint or Motion, has  
 3 not attending any proceedings, and has had no contact with Defendants or their counsel. Such  
 4 inadvertence should not be the basis for denying Plaintiffs the counsel of their own choosing.

5 Plaintiffs note that Nevada has broadly interpreted an "appearance" to include substantive  
 6 communications between the parties for purposes of giving notice before taking a defendant's  
 7 default under NRCPP 55(b)(2). See *Christy v. Carlisle*, 94 Nev. 651, 653 (1978) ("settlement  
 8 negotiations and exchange of correspondence between plaintiff's counsel and defendant");  
 9 *Franklin v. Bartsas Realty, Inc.*, 95 Nev. 559, 565 (1979) (defendant letter sent to plaintiff's  
 10 attorney denying liability in a complaint); *Gazin v. Hoy*, 102 Nev. 621, 624 (1986) (defendant's  
 11 counsel's request for an extension of time to file an answer); *Lindblom v. Prime Hospitality Corp.*,  
 12 120 Nev. 372, 376 (2004) (pre-suit negotiations); and *McNair v. Rivera*, 110 Nev. 463, 471 (1994)  
 13 (plaintiff counsel's own belief and statement that a defendant has appeared). However, the context  
 14 of such interpretations is to ensure that notice of default is given to a defendant who has indicated  
 15 a clear intent to defend a lawsuit. *McNair* at 469. This is wholly inapplicable to the affidavit signed  
 16 by Mr. Fattorosi. Mr. Fattorosi has not engaged in any communications with Defendants' counsel  
 17 and has filed no documents with the Court. Penalizing Mr. Fattorosi for setting forth his personal  
 18 knowledge in an affidavit is unsupported by authority.

### 19 **III. CONCLUSION**

20 Based on the foregoing, both Mr. Fattorosi and Mr. Kuznetsky should be permitted to  
 21 associate in as pro hac vice counsel for Plaintiffs.

22  
 23 DATED this 30th day of September, 2021.

24 THE URBAN LAW FIRM

25  
 26 BY: /s/ Michael A. Urban  
 27 MICHAEL A. URBAN, ESQ.  
 28 Nevada Bar No.: 3875  
 4270 S. Decatur Blvd., Suite A-9  
 Las Vegas, Nevada 89103



**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of September, 2021, I electronically filed the foregoing **MOTION TO ASSOCIATE COUNSEL** with the Clerk of the Court using the Court's Odyssey File and Serve electronic filing system, which will send notification of such filing to the following:

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
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Fax: (818) 736-0999

NICK D. CROSBY, ESQ.  
Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

and I hereby certify that have mailed by United States Postal Service the document to the following non-Odyssey File and Serve participants:

[none]

/s/ Kerri Carder-McCoy  
An Employee of The Urban Law Firm

# EXHIBIT P

A-21-836019-C

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Intentional Misconduct****COURT MINUTES****October 25, 2021**

A-21-836019-C      Lauren Colvin, Plaintiff(s)  
vs.  
Brittanya Razavi, Defendant(s)

**October 25, 2021      3:00 AM      Minute Order**

**HEARD BY:** Bixler, James**COURTROOM:** Chambers**COURT CLERK:**

Nylasia Packer

**RECORDER:****REPORTER:****PARTIES****PRESENT:**

**JOURNAL ENTRIES**

- The Plaintiffs Motion to Associate Counsel (Kuznetsky and Fattorosi) came before this Court on the October 22, 2021 Chamber Calendar. The Court notes no opposition as to Kuznetsky has been filed. Accordingly, pursuant to EDCR 2.20(e) the Motion as to Kuznetsky is deemed unopposed. The Court reviewed the Motion, Opposition and Reply as to Fattorosi. The Court finds that signing an affidavit does not constitute an unauthorized appearance under SCR 42 as the affidavit was included in a filing made by Nevada counsel. Pursuant to all requirements of SCR 42 having been met, COURT ORDERED, motion is GRANTED as to both Kuznetsky and Fattorosi.

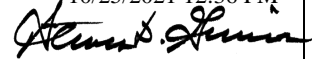
CLERK S NOTE: Counsel are to ensure a copy of the forgoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (10-25-21 np).

PRINT DATE: 10/25/2021

Page 1 of 1

Minutes Date: October 25, 2021

# EXHIBIT Q



CLERK OF THE COURT

**OGM**

1 MICHAEL W. FATTOROSI, ESQ.  
 2 California State Bar No.: 193538  
 3 LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
 4 5850 Canoga Avenue, 4<sup>th</sup> Floor  
 5 Woodland Hills, California 91367  
 6 Michael@fattlegal.com  
 7 PH: (818) 710-2727  
 8 (Admitted *pro hac vice* under SCR 42)

9 MICHAEL D. KUZNETSKY, ESQ  
 10 California State Bar No.: 241045  
 11 KUZNETSKY LAW GROUP, P.C.  
 12 210 N. Pass Avenue, Suite 103  
 13 Burbank, California 91505  
 14 mike@kuzlaw.com  
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 16 Fax: (818) 736-0999  
 17 (Admitted *pro hac vice* under SCR 42)

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 22 Las Vegas, Nevada 89103  
 23 PH: (702) 968-8087  
 24 Fax: (702) 968-8088  
 25 murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

19 LAUREN COLVIN, an individual; YOUREE  
 20 GEMMILL, an individual; and  
 21 PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

23 BRITTANYA RAZAVI; MARCELLO  
 24 RAZAVI; MEOW GANG PRODUCTION  
 25 STUDIOS, INC., DG MEDIA &  
 26 ENTERTAINMENT GROUP, INC., and DOES  
 27 1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**ORDER GRANTING MOTION TO  
ASSOCIATE COUNSEL**

(Michael Kuznetsky)

**ORDER ADMITTING TO PRACTICE**

**MICHAEL D. KUZNETSKY, ESQ.**, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of California and the State Bar of California Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

**ORDERED**, that said application is hereby granted, and **MICHAEL D. KUZNETSKY, ESQ.** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Dated this 25th day of October, 2021



DISTRICT JUDGE

**EA8 AA6 18E2 28B9**  
**David Barker**  
**District Court Judge**

Submitted by:

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875

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Las Vegas, Nevada 89103

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

CSERV

DISTRICT COURT  
CLARK COUNTY, NEVADA

Lauren Colvin, Plaintiff(s)	CASE NO: A-21-836019-C
vs.	DEPT. NO. Department 11
Brittanya Razavi, Defendant(s)	

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order Granting Motion was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 10/25/2021

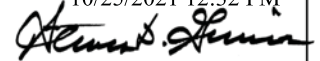
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Valerie Hernquist	vhernquist@theurbanlawfirm.com
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Michael Kuznetsky	Mike@kuzlaw.com
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E. BRYSON	ebbesqltd@yahoo.com
Michael Fattorosi	Michael@fattlegal.com

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Michael Fattorosi	Michael@fattlegal.com
E. Bryson	EBBESQLTD@YAHOO.COM
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
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E. Bryson	ebbesqltd@yahoo.com



# EXHIBIT R



CLERK OF THE COURT

**OGM**

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**ORDER GRANTING MOTION TO  
ASSOCIATE COUNSEL**

(Michael Fattorosi)

**ORDER ADMITTING TO PRACTICE**

**MICHAEL W. FATTOROSI, ESQ.**, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of California and the State Bar of California Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

**ORDERED**, that said application is hereby granted, and **MICHAEL W. FATTOROSI, ESQ.** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Dated this 25th day of October, 2021



DISTRICT JUDGE

908 EB1 FC02 391B  
David Barker  
District Court Judge

Submitted by:

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

**CSERV**

DISTRICT COURT  
CLARK COUNTY, NEVADA

Lauren Colvin, Plaintiff(s)	CASE NO: A-21-836019-C
vs.	DEPT. NO. Department 11
Brittanya Razavi, Defendant(s)	

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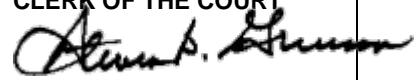
Service Date: 10/25/2021

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Michael Kuznetsky	Mike@kuzlaw.com
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E. BRYSON	ebbesqltd@yahoo.com
Michael Fattorosi	Michael@fattlegal.com

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Michael Fattorosi	Michael@fattlegal.com
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E. Bryson	ebbesqltd@yahoo.com

# EXHIBIT S

**NOEJ**

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Woodland Hills, California 91367  
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PH: (818) 710-2727  
(Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ  
California State Bar No.: 241045  
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MICHAEL A. URBAN, ESQ.  
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murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**NOTICE OF ENTRY OF ORDER  
GRANTING MOTION TO ASSOCIATE  
COUNSEL**

(Michael Kuznetsky)

///

1 PLEASE TAKE NOTICE that on the 25th day of October, 2021, an Order Granting  
2 Plaintiff's Motion to Associate Counsel was entered with this Court, a copy of which is attached  
3 hereto and made a part hereof.

4 DATED this 27th day of October, 2021

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875  
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Las Vegas, Nevada 89103  
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murban@theurbanlawfirm.com  
***Counsel for Plaintiffs***



**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of October, 2021, I electronically filed the foregoing **NOTICE OF ENTRY OF ORDER** with the Clerk of the Court using the Court's Odyssey File and Serve electronic filing system, which will send notification of such filing to the following:

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
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NICK D. CROSBY, ESQ.  
Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

and I hereby certify that have mailed by United States Postal Service the document to the following non-Odyssey File and Serve participants:

[none]

/s/ Kerri Carder-McCoy  
An Employee of The Urban Law Firm

*Heather S. Linn*  
CLERK OF THE COURT

**OGM**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
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***Counsel for Plaintiffs***

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**ORDER GRANTING MOTION TO  
ASSOCIATE COUNSEL**

(Michael Kuznetsky)

**ORDER ADMITTING TO PRACTICE**

**MICHAEL D. KUZNETSKY, ESQ.**, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of California and the State Bar of California Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

**ORDERED**, that said application is hereby granted, and **MICHAEL D. KUZNETSKY, ESQ.** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Dated this 25th day of October, 2021



DISTRICT JUDGE

**EA8 AA6 18E2 28B9**  
**David Barker**  
**District Court Judge**

Submitted by:

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

1 **CSERV**

2  
3 DISTRICT COURT  
CLARK COUNTY, NEVADA

4  
5  
6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 11

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Brittanya Razavi, Defendant(s)

**AUTOMATED CERTIFICATE OF SERVICE**

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Order Granting Motion was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 10/25/2021

Suzanne Boggs

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April Denni

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Valerie Hernquist

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E. Bryson	EBBESQLTD@YAHOO.COM
Michael Fattorosi	Michael@fattlegal.com
Michael Kuznetsky	Mike@kuzlaw.com
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A-21-836019-C

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Intentional Misconduct**

**COURT MINUTES**

**October 25, 2021**

A-21-836019-C      Lauren Colvin, Plaintiff(s)  
vs.  
Brittanya Razavi, Defendant(s)

**October 25, 2021      3:00 AM      Minute Order**

**HEARD BY:** Bixler, James      **COURTROOM:** Chambers

**COURT CLERK:**  
Nylasia Packer

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Plaintiffs Motion to Associate Counsel (Kuznetsky and Fattorosi) came before this Court on the October 22, 2021 Chamber Calendar. The Court notes no opposition as to Kuznetsky has been filed. Accordingly, pursuant to EDCR 2.20(e) the Motion as to Kuznetsky is deemed unopposed. The Court reviewed the Motion, Opposition and Reply as to Fattorosi. The Court finds that signing an affidavit does not constitute an unauthorized appearance under SCR 42 as the affidavit was included in a filing made by Nevada counsel. Pursuant to all requirements of SCR 42 having been met, COURT ORDERED, motion is GRANTED as to both Kuznetsky and Fattorosi.

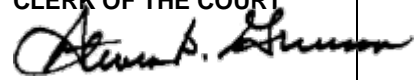
CLERK S NOTE: Counsel are to ensure a copy of the forgoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (10-25-21 np).

PRINT DATE: 10/25/2021

Page 1 of 1

Minutes Date: October 25, 2021

# EXHIBIT T

**NOEJ**

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**NOTICE OF ENTRY OF ORDER  
GRANTING MOTION TO ASSOCIATE  
COUNSEL**

(Michael Fattorosi)

///



1 PLEASE TAKE NOTICE that on the 25th day of October, 2021, an Order Granting  
2 Plaintiff's Motion to Associate Counsel was entered with this Court, a copy of which is attached  
3 hereto and made a part hereof.

4 DATED this 27th day of October, 2021

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875  
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murban@theurbanlawfirm.com  
***Counsel for Plaintiffs***

**CERTIFICATE OF SERVICE**

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Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

and I hereby certify that have mailed by United States Postal Service the document to the following non-Odyssey File and Serve participants:

[none]

/s/ Kerri Carder-McCoy  
An Employee of The Urban Law Firm

*Heather S. Linn*  
CLERK OF THE COURT

**OGM**

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**ORDER GRANTING MOTION TO  
ASSOCIATE COUNSEL**

(Michael Fattorosi)

**ORDER ADMITTING TO PRACTICE**

**MICHAEL W. FATTOROSI, ESQ.**, having filed his Motion to Associate Counsel under Nevada Supreme Court Rule 42, together with a Verified Application for Association of Counsel, a Certificate of Good Standing for the state of California and the State Bar of California Statement; said application having been noticed, no objections having been made, and the Court being fully apprised in the premises, and good cause appearing, it is hereby

**ORDERED**, that said application is hereby granted, and **MICHAEL W. FATTOROSI, ESQ.** is hereby admitted to practice in the above entitled Court for the purposes of the above entitled matter only.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

Dated this 25th day of October, 2021



DISTRICT JUDGE

908 EB1 FC02 391B  
David Barker  
District Court Judge

Submitted by:

**THE URBAN LAW FIRM**

/s/ Michael A. Urban

Michael A. Urban, Nevada Bar No. 3875

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murban@theurbanlawfirm.com

***Counsel for Plaintiffs***

1 **CSERV**

2  
3 DISTRICT COURT  
4 CLARK COUNTY, NEVADA

5  
6 Lauren Colvin, Plaintiff(s)

CASE NO: A-21-836019-C

7 vs.

DEPT. NO. Department 11

8  
9 Brittanya Razavi, Defendant(s)

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12 Court. The foregoing Order Granting Motion was served via the court's electronic eFile  
13 system to all recipients registered for e-Service on the above entitled case as listed below:

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18 April Denni

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19 Valerie Hernquist

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21 Michael Fattorosi

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25 Michael Fattorosi

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Michael Fattorosi	Michael@fattlegal.com
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A-21-836019-C

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

**Intentional Misconduct**

**COURT MINUTES**

**October 25, 2021**

A-21-836019-C      Lauren Colvin, Plaintiff(s)  
vs.  
Brittanya Razavi, Defendant(s)

**October 25, 2021      3:00 AM      Minute Order**

**HEARD BY:** Bixler, James      **COURTROOM:** Chambers

**COURT CLERK:**  
Nylasia Packer

**RECORDER:**

**REPORTER:**

**PARTIES  
PRESENT:**

**JOURNAL ENTRIES**

- The Plaintiffs Motion to Associate Counsel (Kuznetsky and Fattorosi) came before this Court on the October 22, 2021 Chamber Calendar. The Court notes no opposition as to Kuznetsky has been filed. Accordingly, pursuant to EDCR 2.20(e) the Motion as to Kuznetsky is deemed unopposed. The Court reviewed the Motion, Opposition and Reply as to Fattorosi. The Court finds that signing an affidavit does not constitute an unauthorized appearance under SCR 42 as the affidavit was included in a filing made by Nevada counsel. Pursuant to all requirements of SCR 42 having been met, COURT ORDERED, motion is GRANTED as to both Kuznetsky and Fattorosi.

CLERK S NOTE: Counsel are to ensure a copy of the forgoing minute order is distributed to all interested parties; additionally, a copy of the foregoing minute order was distributed to the registered service recipients via Odyssey eFileNV E-Service (10-25-21 np).

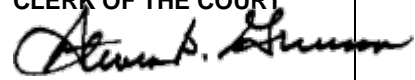
PRINT DATE: 10/25/2021

Page 1 of 1

Minutes Date: October 25, 2021

# EXHIBIT U



**SUMM**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
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murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and  
DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: 11

**SUMMONS****SUMMONS – CIVIL****NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**

1 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ**  
2 **THE INFORMATION BELOW.**

3  
4 **BRITTANYA RAZAVI**

5  
6 **TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff against you  
7 for relief set forth in the Complaint.

- 8 1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you,  
9 exclusive of the day of service, you must do the following:
- 10 a. File with the Clerk of this Court, whose address is shown below, a formal written  
11 response to the Complaint in accordance with the rules of the Court, with the  
12 appropriate filing fee.
- 13 b. Serve a copy of your response upon the attorney whose name and address is shown  
14 below.
- 15 2. Unless you respond, your default will be entered upon application of the Plaintiff, and  
16 failure to so respond will result in a judgment of default against you for the relief  
17 demanded in the Complaint, which could result in the taking of money or property or  
18 other relief requested in the Complaint.
- 19 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so  
20 that your response may be filed on time.

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1 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board  
2 members, commission members and legislators each have 45 days after service of this  
3 Summons within which to file an Answer or other responsive pleading to the Complaint.

4 **CLERK OF THE COURT**

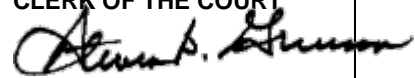
5  
6 By: \_\_\_\_\_ Date \_\_\_\_\_  
7 Deputy Clerk  
8 Regional Justice Center  
9 200 Lewis Avenue  
10 Las Vegas, NV 89155

11 Submitted by:

12 **THE URBAN LAW FIRM**

13 /s/ Michael A. Urban  
14 Michael A. Urban, Nevada State Bar No. 3875  
15 4270 South Decatur Boulevard, Suite A-9  
16 Las Vegas, NV 89103  
17 Telephone: (702) 968-8087  
18 Fax: (702) 968-8088  
19 Email: murban@theurbanlawfirm.com;  
20 *Attorney for Plaintiffs*  
21  
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# **EXHIBIT V**

**SUMM**

MICHAEL W. FATTOROSI, ESQ.  
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murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and  
DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: 11

**SUMMONS****SUMMONS – CIVIL**

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**

1 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ**  
2 **THE INFORMATION BELOW.**

3  
4 **MARCELLO L. RAZAVI**

5  
6 **TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff against you  
7 for relief set forth in the Complaint.

8 1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you,  
9 exclusive of the day of service, you must do the following:

10 a. File with the Clerk of this Court, whose address is shown below, a formal written  
11 response to the Complaint in accordance with the rules of the Court, with the  
12 appropriate filing fee.

13 b. Serve a copy of your response upon the attorney whose name and address is shown  
14 below.

15 2. Unless you respond, your default will be entered upon application of the Plaintiff, and  
16 failure to so respond will result in a judgment of default against you for the relief  
17 demanded in the Complaint, which could result in the taking of money or property or  
18 other relief requested in the Complaint.

19 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so  
20 that your response may be filed on time.

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1 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board  
2 members, commission members and legislators each have 45 days after service of this  
3 Summons within which to file an Answer or other responsive pleading to the Complaint.

4 **CLERK OF THE COURT**

5  
6 By: \_\_\_\_\_ Date \_\_\_\_\_  
7 Deputy Clerk  
8 Regional Justice Center  
9 200 Lewis Avenue  
10 Las Vegas, NV 89155

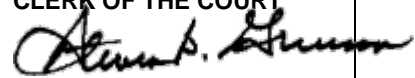
11 Submitted by:

12 **THE URBAN LAW FIRM**

13 /s/ Michael A. Urban  
14 Michael A. Urban, Nevada State Bar No. 3875  
15 4270 South Decatur Boulevard, Suite A-9  
16 Las Vegas, NV 89103  
17 Telephone: (702) 968-8087  
18 Fax: (702) 968-8088  
19 Email: murban@theurbanlawfirm.com;  
20 *Attorney for Plaintiffs*  
21  
22  
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# **EXHIBIT W**



**SUMM**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727  
(Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
Fax: (818) 736-0999  
(Admitted *pro hac vice* under SCR 42)

MICHAEL A. URBAN, ESQ.  
Nevada Bar No.: 3875  
THE URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
PH: (702) 968-8087  
Fax: (702) 968-8088  
murban@theurbanlawfirm.com

**Counsel for Plaintiffs****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and  
DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: 11

**SUMMONS****SUMMONS – CIVIL**

**NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**

1 **WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ**  
2 **THE INFORMATION BELOW.**

3  
4 **MEOW GANG PRODUCTIONS STUDIOS INC.**

5  
6 **TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff against you  
7 for relief set forth in the Complaint.

8 1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you,  
9 exclusive of the day of service, you must do the following:

10 a. File with the Clerk of this Court, whose address is shown below, a formal written  
11 response to the Complaint in accordance with the rules of the Court, with the  
12 appropriate filing fee.

13 b. Serve a copy of your response upon the attorney whose name and address is shown  
14 below.

15 2. Unless you respond, your default will be entered upon application of the Plaintiff, and  
16 failure to so respond will result in a judgment of default against you for the relief  
17 demanded in the Complaint, which could result in the taking of money or property or  
18 other relief requested in the Complaint.

19 3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so  
20 that your response may be filed on time.

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1 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board  
2 members, commission members and legislators each have 45 days after service of this  
3 Summons within which to file an Answer or other responsive pleading to the Complaint.

4 **CLERK OF THE COURT**

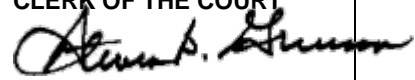
5  
6 By: \_\_\_\_\_ Date \_\_\_\_\_  
7 Deputy Clerk  
8 Regional Justice Center  
9 200 Lewis Avenue  
10 Las Vegas, NV 89155

11 Submitted by:

12 **THE URBAN LAW FIRM**

13 /s/ Michael A. Urban  
14 Michael A. Urban, Nevada State Bar No. 3875  
15 4270 South Decatur Boulevard, Suite A-9  
16 Las Vegas, NV 89103  
17 Telephone: (702) 968-8087  
18 Fax: (702) 968-8088  
19 Email: murban@theurbanlawfirm.com;  
20 *Attorney for Plaintiffs*  
21  
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# **EXHIBIT X**

**SUMM**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727  
(Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
210 N. Pass Avenue, Suite 103  
Burbank, California 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
Fax: (818) 736-0999  
(Admitted *pro hac vice* under SCR 42)

MICHAEL A. URBAN, ESQ.  
Nevada Bar No.: 3875  
THE URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
PH: (702) 968-8087  
Fax: (702) 968-8088  
murban@theurbanlawfirm.com

**Counsel for Plaintiffs****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and  
DOES 1-10 inclusive;

Defendants.

Case No.: A-21-836019-C

Dept. No.: 11

**SUMMONS****SUMMONS – CIVIL****NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU**

**WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 21 DAYS. READ  
THE INFORMATION BELOW.**

**DG MEDIA & ENTERTAINMENT GROUP, INC.**

**TO THE DEFENDANT(S):** A civil Complaint has been filed by the Plaintiff against you  
for relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 21 days after this Summons is served on you,  
exclusive of the day of service, you must do the following:
  - a. File with the Clerk of this Court, whose address is shown below, a formal written  
response to the Complaint in accordance with the rules of the Court, with the  
appropriate filing fee.
  - b. Serve a copy of your response upon the attorney whose name and address is shown  
below.
2. Unless you respond, your default will be entered upon application of the Plaintiff, and  
failure to so respond will result in a judgment of default against you for the relief  
demanded in the Complaint, which could result in the taking of money or property or  
other relief requested in the Complaint.
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so  
that your response may be filed on time.

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1 4. The State of Nevada, its political subdivisions, agencies, officers, employees, board  
2 members, commission members and legislators each have 45 days after service of this  
3 Summons within which to file an Answer or other responsive pleading to the Complaint.

4 **CLERK OF THE COURT**

5  
6 By:

7 Deputy Clerk \_\_\_\_\_ Date \_\_\_\_\_  
8 Regional Justice Center  
9 200 Lewis Avenue  
10 Las Vegas, NV 89155

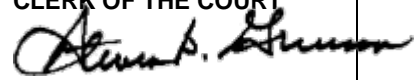
11 Submitted by:

12 **THE URBAN LAW FIRM**

13 /s/ Michael A. Urban  
14 Michael A. Urban, Nevada State Bar No. 3875  
15 4270 South Decatur Boulevard, Suite A-9  
16 Las Vegas, NV 89103  
17 Telephone: (702) 968-8087  
18 Fax: (702) 968-8088  
19 Email: murban@theurbanlawfirm.com;  
20 *Attorney for Plaintiffs*  
21  
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# EXHIBIT Y



**COA**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727  
(Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
2600 W. Olive Avenue, Suite 500  
Burbank, CA 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
Fax: (818) 736-9099  
(Admitted *pro hac vice* under SCR 42)

MICHAEL A. URBAN, ESQ.  
Nevada Bar No.: 3875  
THE URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
PH: (702) 968-8087  
Fax: (702) 968-8088  
murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**NOTICE OF CHANGE OF ADDRESS OF  
COUNSEL**

///

1 TO: Clerk of Court; and All Parties  
2

3 PLEASE TAKE NOTICE that Michael D. Kuznetsky, Esq. and the law firm Kuznetsky  
4 Law Group, P.C, counsel for Plaintiffs, have changed their mailing address to 2600 W. Olive  
5 Avenue, Suite 500, Burbank, CA 91505.

6 All other contact information, including telephone and facsimile numbers, and email  
7 address remains the same.  
8

9 DATED this 14th day of December, 2021.  
10

11 KUZNETSKY LAW GROUP, P.C.  
12

13 /s/Michael D. Kuznetsky  
14 MICHAEL D. KUZNETSKY, ESQ.  
15 2600 W. Olive Avenue, Suite 500  
16 Burbank, CA 91505  
17 *mike@kuzlaw.com*  
18 ***Counsel for Plaintiffs***  
19  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of December, 2021, I electronically filed the foregoing **NOTICE OF CHANGE OF ADDRESS OF COUNSEL** with the Clerk of the Court using the Court's Odyssey File and Serve electronic filing system, which will send notification of such filing to the following:

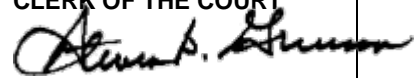
NICK D. CROSBY, ESQ.  
Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

and I hereby certify that have mailed by United States Postal Service the document to the following non-Odyssey File and Serve participants:

[none]

/s/ Michael D. Kuznetsky  
An Employee of KUZNITSKY LAW GROUP, P.C.

# EXHIBIT Z

**COA**

MICHAEL W. FATTOROSI, ESQ.  
California State Bar No.: 193538  
LAW OFFICES OF MICHAEL W. FATTOROSI, P.C.  
5850 Canoga Avenue, 4<sup>th</sup> Floor  
Woodland Hills, California 91367  
Michael@fattlegal.com  
PH: (818) 710-2727  
(Admitted *pro hac vice* under SCR 42)

MICHAEL D. KUZNETSKY, ESQ.  
California State Bar No.: 241045  
KUZNETSKY LAW GROUP, P.C.  
2600 W. Olive Avenue, Suite 500  
Burbank, CA 91505  
mike@kuzlaw.com  
PH: (818) 753-2450  
Fax: (818) 736-9099  
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MICHAEL A. URBAN, ESQ.  
Nevada Bar No.: 3875  
THE URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
PH: (702) 968-8087  
Fax: (702) 968-8088  
murban@theurbanlawfirm.com

***Counsel for Plaintiffs*****DISTRICT COURT****CLARK COUNTY, NEVADA**

LAUREN COLVIN, an individual; YOUREE  
GEMMILL, an individual; and  
PATHAMAWAN HANFORD, an individual,

Plaintiffs,

v.

BRITTANYA RAZAVI; MARCELLO  
RAZAVI; MEOW GANG PRODUCTION  
STUDIOS, INC., DG MEDIA &  
ENTERTAINMENT GROUP, INC., and DOES  
1-10 inclusive;

Defendants.

CASE NO.: A-21-836019-C

DEPT. NO. 11

**NOTICE OF CHANGE OF ADDRESS OF  
COUNSEL**

///

1 TO: Clerk of Court; and All Parties  
2

3 PLEASE TAKE NOTICE that Michael D. Kuznetsky, Esq. and the law firm Kuznetsky  
4 Law Group, P.C, counsel for Plaintiffs, have changed their mailing address to 2600 W. Olive  
5 Avenue, Suite 500, Burbank, CA 91505.

6 All other contact information, including telephone and facsimile numbers, and email  
7 address remains the same.  
8

9 DATED this 14th day of December, 2021.  
10

11 KUZNETSKY LAW GROUP, P.C.  
12

13 /s/Michael D. Kuznetsky  
14 MICHAEL D. KUZNETSKY, ESQ.  
15 2600 W. Olive Avenue, Suite 500  
16 Burbank, CA 91505  
17 *mike@kuzlaw.com*  
18 ***Counsel for Plaintiffs***  
19  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of December, 2021, I electronically filed the foregoing **NOTICE OF CHANGE OF ADDRESS OF COUNSEL** with the Clerk of the Court using the Court's Odyssey File and Serve electronic filing system, which will send notification of such filing to the following:

NICK D. CROSBY, ESQ.  
Nevada Bar No. 8996  
MARQUIS AUBACH COFFING  
10001 Park Run Dr.  
Las Vegas, Nevada 89145

and I hereby certify that have mailed by United States Postal Service the document to the following non-Odyssey File and Serve participants:

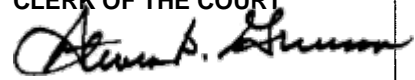
[none]

/s/ Michael D. Kuznetsky  
An Employee of KUZNETSKY LAW GROUP, P.C.

# **EXHIBIT AA**



Electronically Filed  
2/10/2022 9:55 AM  
Steven D. Grierson  
CLERK OF THE COURT



AFDD  
URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
(702) 968-8087  
Counsel for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

LAUREN COLVIN, an individual, YOUREE	)	CASE NO.: A-21-836019-C
GEMMILL, an individual, and	)	DEPT NO.: 11
PATHAMAWAN HANFORD, an individual,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
BRITTANYA RAZAVI, et al.,	)	
	)	
Defendants.	)	

AFFIDAVIT OF DUE DILIGENCE RE: BRITTANYA RAZAVI

State of Nevada )  
 ) ss.  
County of Clark )

I, Michelle Alvarez, being first duly sworn depose and say:

1. That I was at all times mentioned herein a citizen of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve under Nevada license number 389.

2. That Legal Wings, Inc. received a copy of the Summons and Complaint on December 3, 2021, to serve on Defendant Brittanya Razavi at 10300 Mystic Ledge Court, Las Vegas, Nevada 89149. (SEE EXHIBIT A for the results at this address)

3. I received instructions from the office of Urban Law to conduct a skip trace on the Defendant.

4. I checked with TLO, (TLO is a skip-trace database and online people search which can include a subject's Social Security Number, date of birth, address history, phone numbers, email addresses, relatives, social media platforms, employment, and professional licenses. Only valid information resulting from search will be listed.) which revealed a record for Brittanya Razavi, Social Security Number XXX-XX-5407, with a date of birth of July 7, 1985, and the following address history in the last year:

- a. 10300 Mystic Ledge Court, Las Vegas, Nevada 89149 (Clark County) from July 6, 2018 until November 10, 2021; and (SEE EXHIBIT A for results at this address) (Note: I checked with Clark County Assessor's Office which revealed the current owner to be Family Faith Fortune Irrevocable Trust etal Marcello Lucky Razavi TRS with a recorded date of July 2, 2018. This is the Co-Defendant and Defendant's husband.)
- b. 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149 (Clark County) from June 24, 2021 until July 21, 2021. (SEE EXHIBIT A for results at this address) (Note: I checked with Clark County Assessor's Office which revealed the current owner to be 3906 Blue Gull LLC and the trustee to be Brittanya M. Razavi with a recorded date of April 5, 2021.)

The record also revealed the following phone numbers, having a 67 % chance or higher to be associated with the Defendant. Next to the phone numbers are the results:

- a. (951)290-1291 – On January 25, 2022 at 3:12 p.m. I called and a unidentified female answered and asked who I was when I stated the reason for my call she hung up the phone, called again and left a voice message and sent a text. I have not received a reply back to date.
- b. (725) 230-1243 – On January 25, 2022 at 3:15 p.m. I called and was unable to leave a voice message as voicemail is not set up, sent a text message and no reply back to date; and
- c. (805) 988-1391 – On January 25, 2022 at 3:16 p.m. I called and the number is out of service.

5. I checked with Nevada Department of Motor Vehicles, which revealed a record for Brittanya McCall Razavi at 10300 Mystic Ledge Court, Las Vegas, Nevada 89149, with a valid driver's license number XXXXXX4399 that was issued on July 20, 2018 and has an expiration date of July 7, 2026. It also revealed a date of birth of July 7, 1985 and a physical description being female, 5'2", 145 lbs., with brown hair and brown eyes. It further revealed the following vehicles currently registered to the Defendant at the above address:

- a. 2015 Chevy Suburban with Nevada plate number RAZAVI with a last transaction date of July 22, 2021 and expires on July 22, 2022.
- b. 2016 Rolls Royce Wraith with Nevada plate number FDY13TH with a last transaction date of July 9, 2021 and expires on July 6, 2022; and
- c. 2012 Rolls Royce Ghost with Nevada plate number CASHKNG with a last transaction date July 9, 2021 and expires on July 6, 2022.

6. I checked with Clark County Voter's Registrar's Office which revealed an active record for Brittany McCall Razavi at 10300 Mystic Ledge Court, Las Vegas, Nevada 89149, with a date of birth of July 7, 1985.

7. I checked with Clark County Assessor's Office by name, which revealed no record of the Defendant owning any real property or manufactured homes.

8. I checked with Clark County Recorder's Office, which revealed no marriage record for the Defendant.

9. I checked with Nevada Secretary of State, which revealed a record for Brittany M. Razavi as an officer at 6440 Sky Point Drive, Suite 140-434, Las Vegas, Nevada 89131 and shows the Registered Agent to be Kaylee Elizabeth Trabucco at 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149 for the following active corporations:

- a. 3725 Seneca Highlands LLC as managing member
- b. Meow Gang Production Studios, Inc. as managing member; and
- c. 3906 Blue Gull LLC as managing member.

10. I sent postal orders to the United States Post Office on December 10, 2021 and on December 24, 2021 for the following addresses and have not received them back to date:

- a. 10300 Mystic Ledge Court, Las Vegas, Nevada 89149
- b. 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149; and
- c. 6440 Sky Point Drive, Suite 140-434, Las Vegas, Nevada 89131.

11. I checked with Clark County, City of Las Vegas, and City of North Las Vegas, which revealed no business license record for the Defendant.

12. I checked with Clark County District Court, which revealed no other open cases besides this one, or recently closed cases that may provide service address information for the Defendant.

13. I checked with Clark County Family Court which revealed no open cases or recently closed case that may provide service address information for the Defendant.


14. I checked with Clark County Detention Center, City of Las Vegas Jail, City of Henderson Jail, and the Nevada Department of Corrections, which revealed no record for the Defendant currently being incarcerated.

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1           15.     That based on the foregoing information, I was unable to locate and serve the  
2 Defendant, Brittanya Razavi a.k.a. Brittanya McCall Razavi, in Clark County, Nevada.

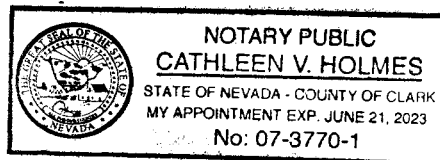
3           I declare that the assertions of this affidavit are true and correct.

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Michelle Alvarez  
Registered Work Card R-102605

Subscribed and Sworn to Before me  
this 25<sup>th</sup> day of January 2022.

  
Notary Public in and for said  
County and State



LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

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# EXHIBIT A

THE URBAN LAW FIRM  
4270 S DECATUR BLVD STE A-9  
LAS VEGAS, NV 89103  
(702) 968-8087



DISTRICT COURT  
CLARK COUNTY, NEVADA

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

TYLER TREWET, SABRINA ROSE, depose(s) and say(s):

That affiant(s) are and were at all times mentioned herein citizen(s) of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve civil process under Nevada license number 389.

Legal Wings, Inc. received on 12/3/2021 a copy of the:  
SUMMONS; COMPLAINT

Based on the results at the address(es) listed below, affiant(s) were unable to serve:  
**Defendant BRITTANYA RAZAVI**

**10300 MYSTIC LEDGE CT, LAS VEGAS, NV 89149**

SABRINA ROSE 12/3/2021 5:45 PM

No answer, left contact sheet. Package outside cannot see label. Ring doorbell is not working. Spoke to neighbor at 10301 who stated that Marc isn't home, but to use the doorbell because the main door leads to a courtyard and they will not hear me knocking. Chevy suburban parked in driveway.

SABRINA ROSE 12/4/2021 10:13 AM

No answer, doorbell is not working. Contact sheet is still here, but package is gone. Car still in driveway.

SABRINA ROSE 12/5/2021 11:59 AM

No answer, ring doorbell worked for the first ring then no longer operating. Contact sheet and car still here.

SABRINA ROSE 12/6/2021 5:30 PM

Contact sheet is moved, no answer and no lights are on inside.

TYLER TREWET 12/26/2021 5:20 PM

**Stake Out** - Upon arrival a black SUV parked in the driveway, trash cans not out and no activity at property. Departed at 7:40 p.m.

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

(CONTINUATION)

TYLER TREWET 1/2/2022 6:32 PM

Trash cans out on street for trash pickup.

TYLER TREWET 1/3/2022 9:30 AM

Trash cans still on street and trash not picked up, yet.

TYLER TREWET 1/9/2022 4:30 PM

**Stake Out #2** - Arrived at 4:30 p.m. and trash cans already out front and Rolls Royce's parked behind gate on side of house.

TYLER TREWET 1/13/2022 2:35 PM

No answer at door, ring doorbell not active and Suburban with Nevada plate #RAZAVI parked in the driveway.

**4895 S. TORREY PINES DR. #201, LAS VEGAS, NV 89103**

TYLER TREWET 12/23/2021 5:28 PM

Gated community - could not gain access.

TYLER TREWET 12/26/2021 2:52 PM

Spoke to an unidentified female who stated the Defendant is unknown. Went to the neighbor's in unit 101 & 104 and received no answer.

**9303 GILCREASE AVE, #1137, LAS VEGAS, NV 89149**

SABRINA ROSE 12/3/2021 6:01 pm

No answer and no noise. Lights are off inside.

SABRINA ROSE 12/4/2021 9:58 am

No answer, blinds are closed cannot see inside, and left contact sheet. No answer at neighbor in unit 1130.

SABRINA ROSE 12/5/2021 12:08 pm

No answer at door, contact sheet still present. Individually owned condos unable to check leasing office.

SABRINA ROSE 12/6/2021 5:50 pm

Contact sheet is gone, lights are in inside and can hear noises inside, no answer at door.

SABRINA ROSE 12/10/2021 5:14 pm

No answer, lights are on upstairs.

SABRINA ROSE 12/11/2021 9:31 AM

Noise within, no answer at door.

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

(CONTINUATION)

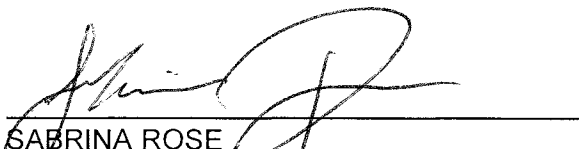
SABRINA ROSE 12/12/2021 1:10 PM  
No answer and no noise. No answer at neighbor in unit 1130.

SABRINA ROSE 12/13/2021 6:20 PM  
Unable to gain access through apartment gates.

Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Monday, January 24, 2022

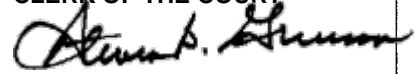
  
TYLER TREWET  
Registered Work Card R-2019-04184

  
SABRINA ROSE  
Registered Work Card R-2020-00191



**EXHIBIT BB**

Electronically Filed  
2/10/2022 9:55 AM  
Steven D. Grierson  
CLERK OF THE COURT



AFDD  
URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
(702) 968-8087  
Counsel for Plaintiffs

DISTRICT COURT

CLARK COUNTY, NEVADA

LAUREN COLVIN, an individual, YOUREE	)	CASE NO.: A-21-836019-C
GEMMILL, an individual, and	)	DEPT NO.: 11
PATHAMAWAN HANFORD, an individual,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
BRITTANY RAZAVI, et al.,	)	
	)	
Defendants.	)	

AFFIDAVIT OF DUE DILIGENCE RE: MARCELLO RAZAVI

State of Nevada )  
 ) ss.  
County of Clark )

I, Michelle Alvarez, being first duly sworn depose and say:

1. That I was at all times mentioned herein a citizen of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve under Nevada license number 389.

2. That Legal Wings, Inc. received a copy of the Summons and Complaint on December 3, 2021, to serve on Defendant Marcello Razavi at 10300 Mystic Ledge Court, Las Vegas, Nevada 89149. (SEE EXHIBIT A for the results at this address)

3. I received instructions from the office of Urban Law to conduct a skip trace on the Defendant.

4. I checked with TLO, (TLO is a skip-trace database and online people search which can include a subject's Social Security Number, date of birth, address history, phone numbers, email addresses, relatives, social media platforms, employment, and professional licenses. Only valid information resulting from search will be listed.) which revealed a record for Marcello Razavi, Social Security Number XXX-XX-6777, with a date of birth of September 16, 1975, and the following address 4895 S. Torrey Pines Drive #201, Las Vegas, Nevada 89103 (Clark County) from

July 20, 2021 until July 21, 2021 to be the only address history in the last year. (SEE EXHIBIT A for results at this address) (Note: I checked with Clark County Assessor's Office which revealed the current owner to be Family Faith Fortune Irrevocable Trust etal Marcello Lucky Razavi TRS with a recorded date of July 2, 2018.) The record also revealed the following phone numbers, having a 67% chance or higher to be associated with the Defendant. Next to the phone numbers are the results:

- a. (949) 481-8808 – On January 25, 2022 at 3:41 p.m. I called and it rings busy.
- b. (949) 444-9468 – On January 25, 2022 at 3:42 p.m. I called and left a voice message for the Defendant and sent a text at 3:46 p.m. and received a text back at 3:49 p.m. "There is no "Marcello" wrong number.
- c. (702) 908-4081 – On January 25, 2022 at 3:43 p.m. I called and left a voice message for the Defendant and sent a text at 3:46 p.m. and have not received a reply back to date.

5. I checked with Nevada Department of Motor Vehicles, which revealed a record for Marcello Lucky Razavi at 4895 S. Torrey Pines Dr. Unit 201, Las Vegas, Nevada 89103, with a valid driver's license number XXXXXX9040 that was issued on December 31, 2020 and has an expiration date of September 16, 2026. It also revealed a date of birth of September 16, 1975 and a physical description being male, 5'9", 200 lbs., with brown hair and brown eyes. It further revealed a 2016 Rolls Royce Dawn with license plate number REV3NGE, to be the current vehicle registered to the Defendant at the above address and a mailing address of 6440 Sky Pointe Drive Suite 201, Las Vegas, Nevada 89131. The registration has a last transaction date of July 9, 2021 and expires on August 29, 2022. (Note: The mailing address above is a UPS Store)

6. I checked with Clark County Voter's Registrar's Office which revealed an active record for Marcello Lucky Razavi at 10300 Mystic Ledge Court, Las Vegas, Nevada 89149 and a mailing address at 4895 Torrey Pines Drive #201, Las Vegas, Nevada 89103, with a date of birth of September 16, 1975.

7. I checked with Clark County Assessor's Office by name, which revealed 4 properties that are currently owned by Marcello Lucky Razavi Irrevocable Spendthrift TR & Marcello Lucky Razavi TRS with the Marcello Lucky Razavi as Trustee of the following properties listed below:

- a. 5334 Joshua Jose Street, North Las Vegas, Nevada 89031, with a recorded date of November 12, 2021. (SEE EXHIBIT B for the results at this address) (Note: Received both postal orders sent out

LEGAL WINGS, INC.  
 PROCESS LICENSE #389  
 LAS VEGAS, NV  
 (702)384-0305

on December 10, 2021 and on December 23, 2021 back marked “Does receive mail at address given”).)

- b. 4912 Quiet Morning Street, Las Vegas, Nevada 89122, with a recorded date of November 19, 2021. (Note: I received the postal order sent out on December 23, 2021 and received it back marked “Not known at address given”, therefore no attempt was made.)
- c. 4179 Story Rock Street, Las Vegas, Nevada 89115, with a recorded date of November 12, 2021. (Note: Have not received the postal orders back to date.)
- d. 4868 Vista Sandia Way, Las Vegas, Nevada 89115, with a recorded date of November 10, 2021; and (Note: Have not received the postal orders back to date.)

The record also revealed the following property 10300 Mystic Ledge Court, Las Vegas, Nevada 89149 is owned by Family Faith Fortune Irrevocable Trust etal & Marcello Lucky Razavi TRS with Marcello Lucky Razavi as Trustee with a recorded date of July 2, 2018. The record also revealed no record of the Defendant owning any manufactured homes.

8. I checked with Clark County Recorder’s Office, which revealed no marriage record for the Defendant.

9. I checked with Nevada Secretary of State, which revealed an active record for DG Media & Entertainment Group, Inc. and the Registered Agent to be Kaylee Trabucco at 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149 with Marcello Lucky Razavi as President, Secretary, Treasurer, and Director at 6440 Sky Pointe Drive Suite 140-440, Las Vegas, Nevada 89131.

10. I checked with Clark County, City of Las Vegas, and City of North Las Vegas, which revealed no business license record for the Defendant.

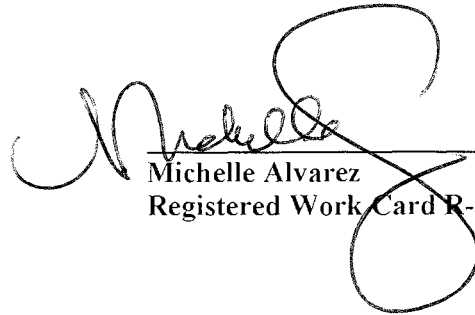
11. I checked with Clark County District Court, which revealed no other open cases besides this one, or recently closed cases that may provide service address information for the Defendant.

12. I checked with Clark County Family Court which revealed no open cases or recently closed case that may provide service address information for the Defendant.

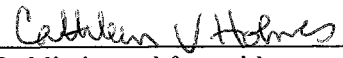
13. I checked with Clark County Detention Center, City of Las Vegas Jail, City of Henderson Jail, and the Nevada Department of Corrections, which revealed no record for the Defendant currently being incarcerated.

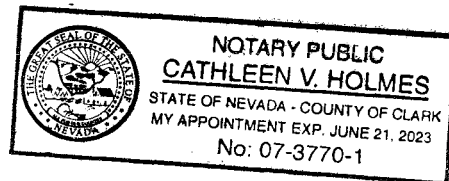
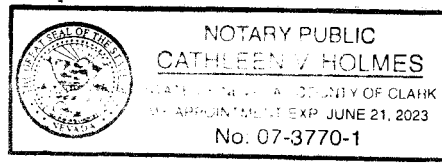
14. That based on the foregoing information, I was unable to locate and serve the Defendant, Marcello Razavi a.k.a. Marcello Lucky Razavi, in Clark County, Nevada.

I declare that the assertions of this affidavit are true and correct.

  
Michelle Alvarez  
Registered Work Card R-102605

Subscribed and Sworn to Before me  
this 28<sup>th</sup> day of January 2022.

  
Notary Public in and for said  
County and State



LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

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## EXHIBIT A

THE URBAN LAW FIRM  
4270 S DECATUR BLVD STE A-9  
LAS VEGAS, NV 89103  
(702) 968-8087



DISTRICT COURT  
CLARK COUNTY, NEVADA

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

TYLER TREWET, SABRINA ROSE, depose(s) and say(s):

That affiant(s) are and were at all times mentioned herein citizen(s) of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve civil process under Nevada license number 389.

Legal Wings, Inc. received on 12/3/2021 a copy of the:  
SUMMONS; COMPLAINT

Based on the results at the address(es) listed below, affiant(s) were unable to serve:  
**Defendant MARCELLO RAZAVI**

**10300 MYSTIC LEDGE CT, LAS VEGAS, NV 89149**

SABRINA ROSE 12/3/2021 5:45 PM

No answer, left contact sheet. Package outside cannot see label. Ring doorbell is not working. Spoke to neighbor at 10301 who stated that Marc isn't home, but to use the doorbell because the main door leads to a courtyard and they will not hear me knocking. Chevy suburban parked in driveway.

SABRINA ROSE 12/4/2021 10:13 AM

No answer, doorbell is not working. Contact sheet is still here, but package is gone. Car still in driveway.

SABRINA ROSE 12/5/2021 11:59 AM

No answer, ring doorbell worked for the first ring then no longer operating. Contact sheet and car still here.

SABRINA ROSE 12/6/2021 5:30 PM

Contact sheet is moved, no answer and no lights are on inside.

TYLER TREWET 12/26/2021 5:20 PM

**Stake Out** - Upon arrival a black SUV parked in the driveway, trash cans not out and no activity at property. Departed at 7:40 p.m.

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

(CONTINUATION)

TYLER TREWET 1/2/2022 6:32 PM

Trash cans out on street.

TYLER TREWET 1/3/2022 9:30 AM

Trash cans still on street and trash not picked up, yet.

TYLER TREWET 1/9/2022 4:30 PM

**Stake Out #2** - Arrived at 4:30 p.m. and trash cans already out front and Rolls Royce's parked behind gate on side of house.

TYLER TREWET 1/13/2022 2:35 PM

No answer at door, ring doorbell not active and Suburban with Nevada plate #RAZAVI parked in the driveway.

**4895 S. TORREY PINES DR. #201, LAS VEGAS, NV 89103**

TYLER TREWET 12/23/2021 5:28 PM

Gated community - no access

TYLER TREWET 12/26/2021 2:52 PM

Spoke to an unidentified female who stated the Defendant is unknown. Went to the neighbor's in unit 101 & 104 and received no answer.

**9303 GILCREASE AVE, #1137, LAS VEGAS, NV 89149**

SABRINA ROSE 12/3/2021 5:43 PM

No answer and no noise. Lights are off inside.

SABRINA ROSE 12/4/2021 9:58 am

No answer, blinds are closed cannot see inside. No answer at neighbor in unit 1130 and left contact sheet.

SABRINA ROSE 12/5/2021 12:08 pm

No answer, contact sheet still present. Individually owned condos unable to check leasing office.

SABRINA ROSE 12/6/2021 6:50 pm

Contact sheet gone, lights are on inside and can hear voices within. No answer at door.

SABRINA ROSE 12/10/2021 5:14 pm

No answer, lights on upstairs.

SABRINA ROSE 12/11/2021 9:31 am

Noise within and no answer at door.

SABRINA ROSE 12/12/2021 1:10 pm

No answer and no noise



LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:


**DECLARATION OF  
ATTEMPTED SERVICE**

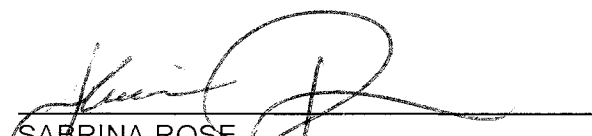
(CONTINUATION)

SABRINA ROSE 12/13/2021 6:20 pm  
Unable to gain access through apartment gates.

Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Tuesday, January 25, 2022

  
\_\_\_\_\_  
TYLER TREWET  
Registered Work Card R-2019-04184

  
\_\_\_\_\_  
SABRINA ROSE  
Registered Work Card R-2020-00191

LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

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## EXHIBIT B

THE URBAN LAW FIRM  
4270 S DECATUR BLVD STE A-9  
LAS VEGAS, NV 89103  
(702) 968-8087



DISTRICT COURT  
CLARK COUNTY, NEVADA

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

MICHELLE ALVAREZ, depose(s) and say(s):

That affiant(s) are and were at all times mentioned herein citizen(s) of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve civil process under Nevada license number 389.

Legal Wings, Inc. received on 12/3/2021 a copy of the:  
SUMMONS; COMPLAINT

Based on the results at the address(es) listed below, affiant(s) were unable to serve:  
**Defendant MARCELLO RAZAVI**

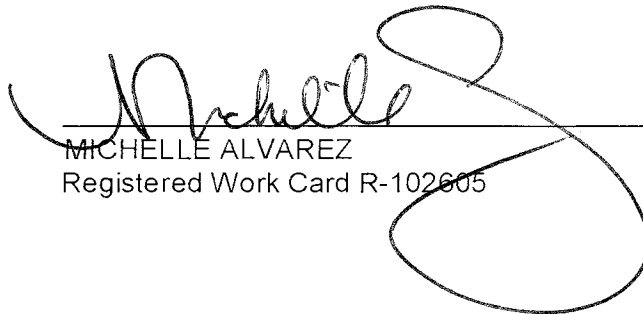
**5334 JOSHUA JOSE STREET, NORTH LAS VEGAS, NV 89031**

MICHELLE ALVAREZ                      1/27/2022                      7:10 PM

Spoke to "Maria Escobar", current resident, Hispanic, female 35, 5'3, 145, brown hair and eyes, who stated she rents through a management company and the Defendant is unknown, no vehicles in driveway, just moved in this month. No answer at the neighbors at 5338 Joshua Jose

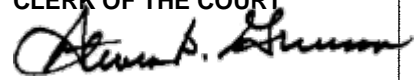
Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Tuesday, January 25, 2022

  
MICHELLE ALVAREZ  
Registered Work Card R-102605

**EXHIBIT CC**

Electronically Filed  
2/10/2022 9:55 AM  
Steven D. Grierson  
CLERK OF THE COURT



AFDD  
URBAN LAW FIRM  
4270 S. Decatur Blvd., Suite A-9  
Las Vegas, Nevada 89103  
(702) 968-8087  
Counsel for Plaintiff's

DISTRICT COURT

CLARK COUNTY, NEVADA

LAUREN COLVIN, an individual, YOUREE  
GEMMILL, an individual, and  
PATHAMAWAN HANFORD, an individual,  
  
Plaintiffs,

vs.

BRITTANYA RAZAVI, et al.,  
  
Defendants.

CASE NO.: A-21-836019-C  
DEPT NO.: 11

AFFIDAVIT OF DUE DILIGENCE RE: DG MEDIA & ENTERTAINMENT GROUP, INC.

State of Nevada )  
) ss.  
County of Clark )

I, Michelle Alvarez, being first duly sworn, depose and say:

1. That at all times mentioned herein I am a citizen of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve under Nevada license number 389.

2. That Legal Wings, Inc. received a copy of the Summons and Complaint on December 3, 2021, to serve Defendant DG Media Entertainment Group, Inc. by serving Kaylee Trabucco, Registered Agent at 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149. (SEE EXHIBIT A for the results at this address) (Note: I checked with Clark County Assessor's Office which revealed the current owner of this property to be 3906 Blue Gull LLC with Trustee Brittanya McCall Razavi, Co-Defendant with a recorded date of April 5, 2021.)

3. I received instructions from the office of Urban Law to conduct a skip trace on DG Media & Entertainment Group, Inc.

4. I checked with Nevada Secretary of State which revealed an active record for DG Media & Entertainment Group, Inc. with Kaylee Trabucco, Registered Agent at 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149 and Marcello Razavi as President, Secretary, Treasurer and Director at 6440 Sky Point Drive, Suite 140-434, Las Vegas, Nevada, Las Vegas 89131. (Note: The address is a UPS Store and on January 14, 2022 and on January 28, 2022 requesting the physical address and have not received them back to date.)

5. I checked TLO which revealed a record for Kaylee Trabucco, Social Security Number XXX-XX-3933, with a date of birth of March 29, 2000 and the following address history within the last year:

- a. 29668 Desert Terrace Drive, Menifee, California 92584 (Riverside County) from May 26, 2020 until December 9, 2021; and (SEE EXHIBIT B for results at this address) (Note: I checked with Riverside County Assessor's Office which revealed the current owner to be Jeremy and Lilia Lieu with a recorded date of January 2012 and does not show the Registered Agent as a previous owner.)
- b. 34890 Cameron Lane, Wildomar, California 92595 (Riverside County) from July 13, 2018 until May 1, 2021. (SEE EXHIBIT B for results at this address) (Note: I checked with Riverside County Assessor's Office which revealed the current owner to be Megan Green with a recorded date of March 2012 and does not show the Registered Agent as a previous owner.)

The record further revealed the following phone number (951) 609-6690, having an 86% chance to associated with the Registered Agent. On January 25, 2022 at 2:29 p.m. I called and spoke to an unidentified male who stated wrong number.

6. I sent postal orders to the United States Post Office on January 14, 2022 and on January 28, 2022 for the following addresses listed below and have not received them back to date:

- a. 9303 Gilcrease Avenue #1137, Las Vegas, Nevada 89149.
- b. 29668 Desert Terrace Drive, Menifee, California 92584; and
- c. 34890 Cameron Lane, Wildomar, California 92595.

7. I checked with Nevada Secretary of State which revealed the following 3 active corporations below with Kaylee Trabucco as Registered Agent at 9303 Gilcrease Drive #1137, Las Vegas, Nevada 89139.

- a. 3725 Seneca Highlands LLC - Managing member to be Brittanya M. Razavi, President, Secretary, Treasurer, and Director of entity at 6440 Sky Point Dr., Ste. 104-434, Las Vegas, Nevada 89131.

- b. Meow Gang Production Studios, Inc. – Managing member to be Brittany M. Razavi, President, Secretary, Treasurer, and Director at 6440 Sky Point Dr., Ste. 104-434, Las Vegas, Nevada 89131; and
- c. 3906 Blue Gull LLC - Managing member to be Brittany M. Razavi, President, Secretary, Treasurer, and Director at 6440 Sky Point Dr., Ste. 104-434, Las Vegas, Nevada 89131.

(Note: While doing locates on Marcello & Brittany Razavi, Co-Defendant's and managing members of the entities in question and I found the following addresses to attempt service for the individuals and as the managing members at: (SEE EXHIBIT A for the results at these addresses)

- a. 10300 Mystic Ledge Court, Las Vegas, Nevada 89149; and
- b. 4895 S. Torrey Pines Drive #201, Las Vegas, Nevada 89103.

The records further revealed another address at 5334 Joshua Jose Street, North Las Vegas, Nevada 89031 for the managing member of this entity. (SEE EXHIBIT C for the results at this address)

8. I checked with the Nevada Department of Motor Vehicles which revealed no record for Kaylee Trabucco having a driver's license or identification card. It further revealed no vehicles currently registered in her name.

9. I checked the Clark County and Riverside County Voter's Registrar which revealed no record for Kaylee Trabucco.

10. I checked with Clark County, Nevada Assessor's Office by name which revealed no record of Kaylee Trabucco owning any real property or manufactured homes.

11. I checked with Riverside County, California Assessor's Office by name which revealed no record for Kaylee Trabucco owning any real property or manufactured homes.

12. I checked with the Clark and Riverside County Detention Center, City of Las Vegas Jail, City of Henderson Jail, and the Nevada & California Department of Corrections, which revealed no record for the Kaylee Trabucco currently being incarcerated

13. I checked with Clark County, the City of Las Vegas, and the City of North Las Vegas, and Henderson which did not reveal a business license for DG Media & Entertainment Group, Inc.

14. I checked with Clark County Fictitious Firm Name which revealed no record for DG Media & Entertainment Group, Inc.

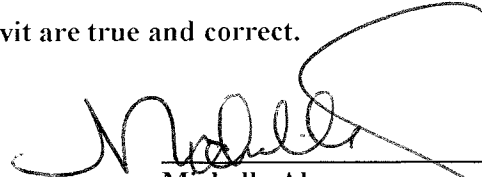
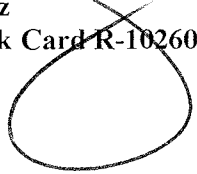
15. I checked with Nevada State Contractors Board which revealed no record for DG Media & Entertainment Group, Inc.

16. I did an internet search for DG Media & Entertainment Group, Inc., which revealed no official website for this company and no new service address information to attempt service.


1           17. I checked social media Facebook, Twitter and LinkedIn and found no profile for  
2 DG Media & Entertainment Group, Inc.

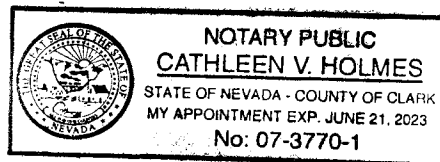
3           18. That based on the foregoing information, I was unable to locate and serve DG  
4 Media & Entertainment Group, Inc. in Clark County, Nevada and Riverside County, California.

5 I declare that the assertions of this affidavit are true and correct.

6   
7 Michelle Alvarez  
8 Registered Work Card R-102605  
9 

10 Subscribed and Sworn to Before me  
11 this 28<sup>th</sup> day of January 2022.

12   
13 Notary Public in and for said  
14 County and State



LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305



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LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

## EXHIBIT A

THE URBAN LAW FIRM  
4270 S DECATUR BLVD STE A-9  
LAS VEGAS, NV 89103  
(702) 968-8087



LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

DISTRICT COURT  
CLARK COUNTY, NEVADA

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

TYLER TREWET, SABRINA ROSE, depose(s) and say(s):

That affiant(s) are and were at all times mentioned herein citizen(s) of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve civil process under Nevada license number 389.

Legal Wings, Inc. received on 12/3/2021 a copy of the:  
SUMMONS; COMPLAINT

Based on the results at the address(es) listed below, affiant(s) were unable to serve:

**Defendant DG MEDIA & ENTERTAINMENT GROUP, INC., BY SERVING KAYLEE TRABUCCO,  
REGISTERED AGENT**

**10300 MYSTIC LEDGE CT, LAS VEGAS, NV 89149**

SABRINA ROSE 12/3/2021 5:43 pm

No answer, left contact sheet. Package outside cannot see label. Ring doorbell is not working. Spoke to neighbor at 10301 who stated that Marc isn't home, but to use the doorbell because the main door leads to a courtyard and they will not hear me knocking. Chevy suburban parked in driveway.

SABRINA ROSE 12/4/2021 10:13 am

No answer, doorbell not working. Contact sheet still there, but package gone. Car still in driveway.

SABRINA ROSE 12/5/2021 11:59 am

No answer, doorbell worked for the first ring then no longer operating. Contact sheet and car still there.

SABRINA ROSE 12/6/2021 5:30 pm

Contact sheet moved, no answer, and no lights on inside.

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

(CONTINUATION)

TYLER TREWET 12/26/2021 5:20 pm  
**Stake Out** - Upon arrival a black SUV parked in the driveway, trash cans not out and no activity at property. Departed at 7:40 p.m.

TYLER TREWET 1/2/2022 6:32 pm  
Trash cans out on street for trash pickup.

TYLER TREWET 1/3/2022 9:30 am  
Trash cans still on street not picked up.

TYLER TREWET 1/9/2022 4:30 pm  
**Stake Out #2** - Arrived at 4:30 p.m. and trash cans already out front and Rolls Royce's parked behind gate on side of house.

TYLER TREWET 1/13/2022 2:35 pm  
No answer at door, ring doorbell not active and Suburban with Nevada plate #RAZAVI parked in the driveway.

**4895 S. TORREY PINES DR. #201, LAS VEGAS, NV 89103**

TYLER TREWET 12/23/2021 5:28 PM  
Gated community - could not gain access.

TYLER TREWET 12/26/2021 2:52 PM  
Spoke to unidentified female who stated the Defendant is unknown. Went to the neighbor's in unit 101 & 104 and received no answer.

**9303 GILCREASE AVE, #1137, LAS VEGAS, NV 89149**

SABRINA ROSE 12/3/2021 6:01 PM  
No answer and no noise. Lights are off inside.

SABRINA ROSE 12/4/2021 9:58 AM  
No answer, blinds are closed cannot see inside. No answer at neighbor in 1130 left contact sheet.

SABRINA ROSE 12/5/2021 12:08 PM  
No answer at door, contact sheet still present. Individually owned condos unable to check leasing.

SABRINA ROSE 12/6/2021 6:50 PM  
Contact sheet is gone, lights are on inside and can hear noises within. No answer at the door.

LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

(CONTINUATION)

SABRINA ROSE 12/10/2021 5:14 PM

No answer, lights are on upstairs.

SABRINA ROSE 12/11/2021 9:31 AM

Noise within, no answer at door.

SABRINA ROSE 12/12/2021 1:10 PM

No answer and no noise. No answer at neighbor at 1130.

SABRINA ROSE 12/13/2021 6:20 PM

Unable to gain access through apartment gates

Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

Executed: Tuesday, January 25, 2022

  
TYLER TREWET  
Registered Work Card R-2019-04184

  
SABRINA ROSE  
Registered Work Card R-2020-00191

LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

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## EXHIBIT B

**AFFIDAVIT OF NON-SERVICE**

State of Nevada

County of Clark, District

Case Number: A-21-836019-C

Plaintiff:  
Lauren Colvin

vs.

Defendant:  
Brittanya Razavi

For:  
Legal Wings, Inc.  
1118 Fremont St.  
Las Vegas, NV 89101

Received by Sano Attorney Service to be served on DG Media & Entertainment Group, Inc. Kaylee Elizabeth Trabucco, Registered Agent, 29668 Desert Terrace Dr., Menifee, CA 92584.

I, Devan Shockley, being duly sworn, depose and say that on the 20th day of January, 2022 at 3:35 pm, I:

**NON-SERVED the Summons and Complaint** : After due search, careful inquiry and diligent efforts, an employee, independent contractor and/or myself have been unable to effect service of process for the reasons detailed below.

**Additional Information pertaining to this Service:**

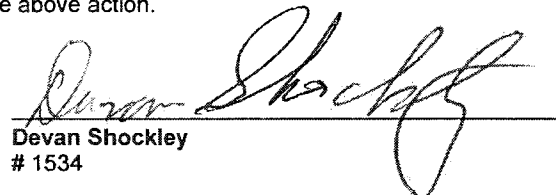
Attempted Service. 29668 Desert Terrace Dr., Menifee, CA - 1/4/22 @ 7:05 pm - No answer. House dark. 1/6/22 @ 8:20 am - No answer. 1/7/22 @ 3:12 pm - No answer. 1/9/22 @ 1:10 pm - No answer.

Bad Address. 34890 Cameron Lane, Wildomar, CA - 1/15/22 @ 3:50 pm - This home is completely fenced and posted for sale. No response. 1/18/22 @ 6:45 pm - No response to horn or whistling. 1/20/22 @ 3:35 pm - Defendant is unknown at this address.

I certify that I am over the age of 18 and have no interest in the above action.

Subscribed and Sworn to before me on the 25<sup>th</sup> day  
of January, 2022 by the affiant who is  
personally known to me

NOTARY PUBLIC

  
Devan Shockley  
# 1534

Sano Attorney Service  
P.O. Box 1568  
Riverside, CA 92502  
(909) 425-2248

Our Job Serial Number: SNO-2022000447  
Ref: 1955425.03  
Service Fee: \_\_\_\_\_



Service was  
( ) made (X) attempted  
outside the state of Nevada  
not subject to NRS 14.025



LEGAL WINGS, INC.  
PROCESS LICENSE #389  
LAS VEGAS, NV  
(702)384-0305

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## EXHIBIT C

THE URBAN LAW FIRM  
4270 S DECATUR BLVD STE A-9  
LAS VEGAS, NV 89103  
(702) 968-8087



LAUREN COLVIN, ET AL.  
Plaintiff

vs

BRITANYA RAZAVI, ET AL.  
Defendant

DISTRICT COURT  
CLARK COUNTY, NEVADA

Case Number: A-21-836019-C

Dept:

**DECLARATION OF  
ATTEMPTED SERVICE**

MICHELLE ALVAREZ, depose(s) and say(s):

That affiant(s) are and were at all times mentioned herein citizen(s) of the United States, over 18 years of age, not a party to, nor interested in the within action, and licensed to serve civil process under Nevada license number 389.

Legal Wings, Inc. received on 12/3/2021 a copy of the:  
SUMMONS; COMPLAINT

Based on the results at the address(es) listed below, affiant(s) were unable to serve:

**Defendant DG MEDIA & ENTERTAINMENT GROUP, INC., BY SERVING KAYLEE TRABUCCO,  
REGISTERED AGENT**

**5334 JOSHUA JOSE STREET, NORTH LAS VEGAS, NV 89031**

MICHELLE ALVAREZ

1/27/2022 7:10 PM

Spoke to "Maria Escobar", current resident, Hispanic, female 35, 5'3, 145, brown hair and eyes, who stated she rents through a management company and the Defendant is unknown, no vehicles in driveway, just moved in this month. No answer at the neighbors at 5338 Joshua Jose.

Pursuant to NRS 53.045, I declare under penalty of perjury under the law of the State of Nevada that the forgoing is true and correct.

  
MICHELLE ALVAREZ  
Registered Work Card R-102605

Executed: Friday, January 28, 2022